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3 UNITED STATES DISTRICT COURT
4 EASTERN DISTRICT OF PENNSYLVANIA
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7 UNITED STATES OF AMERICA) 18-249-2, -3, -4, -8
8 vs.)
9 ABDUL IBRAHIM WEST)
10 JAMAAL BLANDING)
11 JAMEEL HICKSON)
12 HANS GADSON) Philadelphia, PA
13) November 14, 2019
14 Defendant) 8:54 a.m.
15
16

17 TRIAL
18 BEFORE THE HONORABLE MICHAEL M. BAYLSON
19 UNITED STATES DISTRICT JUDGE
20
21 APPEARANCES:
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1 I N D E X

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3 SPECIAL AGENT RANDY L. UPDEGRAFF
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16 DAVID LEFF
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1 (Clerk opens court at 8:54 a.m.)

2 THE COURT: Okay. Good morning, everyone. All
3 right. Let's go on the record. All counsel are here, but the
4 defendants are not here yet. But this is primarily a legal
5 issue.

6 First of all, regarding the First Step Act, we've
7 done some research on this. I don't think there's anything in
8 this statute that requires me to ask the jury anything about
9 the defendant's prior convictions. That's number one.

10 MR. WITHERELL: Judge, I think I disagree. I think
11 that it is an element that needs to be put forth to the jury.

12 THE COURT: You said there's an agreement. You have
13 a stipulation.

14 MR. WITHERELL: I agree there's a stipulation, and I
15 do not believe that it has to be a bifurcated trial. I believe
16 that we're entitled to put that before the jury. We've agreed
17 to make it a bifurcated trial so that we do not prejudice the
18 jury with their prior convictions.

19 I think that after the jury comes back, if they come
20 back with verdicts as to defendants, the ones that it's been
21 applied to, the additional evidence has to be provided to them,
22 and that is just going to be the stipulations. And then I
23 think they have to deliberate yet again on that aspect.

24 THE COURT: I'll take that under consideration.

25 All right. Next, the jury verdict form. The word

1 "and" in the second sentence on Count 1 should be changed to
2 "or."

3 MR. MEEHAN: I'm going to object to that, Judge.

4 THE COURT: Yes. I understand that.

5 MR. MEEHAN: I want to be heard on that also.

6 THE COURT: Otherwise, does anybody have any
7 objections to this?

8 MR. WITHERELL: We do, Judge. I think all counsel
9 are in agreement on this. I think that with your jury form,
10 every defendant, the weight attributable to them -- I agree
11 that they should come to a verdict as to the count, but then
12 the interrogatories given to them concerning those counts have
13 to be individualized.

14 THE COURT: They are.

15 MR. WITHERELL: I don't believe they are.

16 THE COURT: They absolutely are. We go through it
17 one by one. Well, if you say that every interrogatory for
18 cocaine and methamphetamine has to be individualized, no,
19 because it only refers to defendants that have been found
20 guilty on that count.

21 MR. MEEHAN: But when you use "or," you're not making
22 it individualized, Judge.

23 THE COURT: That's what the Phillips case talks
24 about.

25 MR. WITHERELL: No, Judge.

1 MR. MEEHAN: Doesn't mean it's right.

2 MR. WITHERELL: I think that the count, the way it's
3 read is correct. What I'm saying, Judge, is that if they find,
4 for example --

5 THE COURT: Look at page 2 under cocaine. Reasonably
6 foreseeable to the defendant or defendants you have found
7 guilty.

8 MR. WITHERELL: Right. But, Judge, my point being
9 this. If we go to Count 1 --

10 THE COURT: That's where I am.

11 MR. WITHERELL: I believe an individualized approach
12 is what's needed. So they may find that all defendants are
13 guilty of conspiracy, the conspiracy to contribute controlled
14 substances, but they may find that Defendant West --

15 THE COURT: Have you read the Phillips case? The
16 judge at sentencing can ascribe it to individual defendants.
17 That's what the Phillips case holds, that, at sentencing, the
18 judge can look at the evidence and make decisions as to whether
19 there's sufficient evidence as to any particular defendant on
20 that interrogatory.

21 MR. WITHERELL: Judge, I believe that the
22 individual -- I'm referring particularly to Alleyne v. United
23 States 133 Supreme Court 2151 from 2013.

24 THE COURT: Let me have that citation again.

25 MR. WITHERELL: 133 Supreme Court 2151, 2013.

1 THE COURT: Name of the case?

2 MR. WITHERELL: Alleyne versus the United States. I
3 believe that case particularly discusses that when there is a
4 sentencing enhancement, it has to be proven to the jury.

5 THE COURT: Talking about a fact.

6 MR. WITHERELL: Correct. Those enhancements aren't
7 the actual charge, right? Conspiracy is the one charge. But
8 the enhancements are part of the interrogatories given to each
9 defendant. And while they may find that the conspiracy has
10 many, many different types of drugs, they may find only
11 attributable amounts of drugs to certain defendants, which
12 would enhance their specific sentencing in this case. So I
13 believe that while the charges are correct, the interrogatories
14 given to the jury afterwards have to be specific to each
15 defendant.

16 MR. HUGHES: I think that's correct, Your Honor.

17 THE COURT: Okay. I'll take it under advisement.
18 I'm not sure I agree.

19 All right. The next item is that --

20 MR. GOLDMAN: Your Honor, while we're on that, all of
21 us have other problems with your verdict slip also. I was
22 talking with the -- we think that the Government's is more
23 correct, and what I was going to do this weekend is to do a red
24 line version of the Government's to give you what's the
25 consensus of the Government and --

1 THE COURT: You're willing to submit anything you
2 like.

3 MR. GOLDMAN: Do you want to hear any further
4 argument on the verdict slip? If not, I'll sit down.

5 THE COURT: Not right now.

6 Now, in the opinion I issued on the rap music issue,
7 the Government's motion to admit it, which I granted in part, I
8 said in there that I would consider a point for charge about
9 the receipt of this evidence. I've prepared something myself.
10 I'm going to hand out copies, but I just want to read it into
11 the record.

12 I think something along this topic should be included
13 because of the defendants' argument that there was a
14 possibility or a likelihood, whatever you want to call it, that
15 the jury may hold it against the defendants as to their style
16 of language or style of music.

17 So this is what I propose to say: You've heard and
18 seen evidence of social media, such as Instagram, and music
19 referred to as rap or gangsta rap. You may not consider this
20 evidence merely because of its nature or style or the language
21 used. Every person has the right to express himself or herself
22 in a manner or style that is of their own choosing and to use
23 any words or language they choose.

24 You may, however, consider this evidence if the
25 Government has shown that the content of the evidence, that is,

1 the words used, is probative of the charges in this case. One
2 example of the proper use of this evidence would be if you find
3 the words used were evidence of the existence or furtherance of
4 the charge of conspiracy.

5 Another example of the proper use of this evidence
6 would be if you find that the words used are evidence that any
7 defendant was involved in the distribution or possession of a
8 controlled substance, such as cocaine, crack-cocaine,
9 methamphetamine, or heroin. However, you may only consider the
10 actual words used against the defendant and not the style or
11 expression or type of social media or music the defendants
12 choose. So I'll give you all copies so that we can talk about
13 it later.

14 Okay. Are we ready for the jury? Is the jury here?

15 MR. STENGEL: I believe so.

16 Your Honor, there's a PowerPoint that we discussed
17 several times. It's going to be marked as Government
18 Exhibit 3004.

19 THE COURT: Yes.

20 MR. STENGEL: This contains Special Agent Updegraff's
21 conclusions. Special Agent Becker sort of did the legwork to
22 put it together. I'm planning to introduce it through Special
23 Agent Updegraff. I just want to make sure we're all in
24 agreement that I don't have to put Becker up briefly to
25 introduce it.

THE COURT: No. I'm going to give a very short statement to the jury that this is a summary.

MR. STENGEL: There are also, Your Honor, from the hard copy I handed out yesterday, there are three slides that have changed. Two were dependent, as Mr. Hughes had sort of brought up, were dependent upon the potential testimony of Mr. Eric Brooks-Blanding, which did not come in. So we had to adjust our read on those, and then there's just one other where we caught a calculation error. Other than that, we're good to go.

THE COURT: All right. We're waiting for the jury.

Agent Updegraff, come up to the stand.

(The jury enters the courtroom at 9:07 a.m.)

THE COURT: Good morning, ladies and gentlemen of the jury. We are ready to begin and we are at the next witness on the witness stand.

Please swear in the witness.

THE CLERK: Please raise your right hand.

(Witness sworn.)

THE CLERK: Thank you. Please state your full name and spell your last name for the record.

THE WITNESS: Randy L. Updegraff, U-P-D-E-G-R-A-F-F.

— — —

DIRECT EXAMINATION ON VOIR DIRE

1 - - -

2 BY MR. STENGEL:

3 Q. Good morning, sir.

4 A. Good morning, Counselor.

5 Q. Could you please tell the jury what you do for a
6 living?

7 A. Certainly. I'm a Supervisory Special Agent with the
8 Drug Enforcement Administration based in Philadelphia,
9 Pennsylvania.

10 Q. The Drug Enforcement Administration we commonly know
11 as the DEA, correct?

12 A. That is correct.

13 Q. What do you do as a supervisory special agent?

14 A. As a supervisory special agent, I'm responsible for
15 nine special agents in the investigation of narcotics
16 trafficking, under the Controlled Substances Act, of the
17 manufacture, distribution, and importation of narcotics.

18 Q. Prior to being a supervisory special agent with the
19 DEA, what was your job?

20 A. Prior to that, I was a special agent working here in
21 Philadelphia in Group 2, or Group 21 as it is now, from
22 approximately 2012 to 2016, when I became a supervisory special
23 agent in 2016. Prior to 2012 --

24 MR. GOLDMAN: Excuse me. Could you speak into the
25 microphone. We can't hear you.

SPECIAL AGENT UPDEGRAFF - DIRECT ON VOIR DIRE

1 THE WITNESS: Certainly, Counselor.

2 THE COURT: That's better. Thank you.

3 THE WITNESS: Prior to 2012, I was assigned to the
4 Clandestine Laboratory Team. Prior to that, I was assigned to
5 the Mobile Enforcement Team, which was a team of ten agents
6 that traveled around local municipalities within the state of
7 Pennsylvania and Delaware supporting local law enforcement.

8 BY MR. STENGEL:

9 Q. During your career -- I'm sorry. How long have you
10 been with the DEA?

11 A. I've been with the DEA since October of 1998.

12 Q. So since October of 1998, have you undergone any sort
13 of specialized trainings?

14 A. I have. In October of 1998, I went to a 17-week DEA
15 academy where I went through classes and constitutional, drug
16 law, various confidential informant handling, a 17-week school.
17 And post my graduation from the DEA academy, I've gone to
18 approximately 20 following schools for professional education.

19 Q. Did that include training in investigative
20 techniques?

21 A. That's correct.

22 Q. Now, it's not all classroom training, correct?

23 A. No. Primarily the training is on-the-job training or
24 on the street.

25 Q. So you have participated in narcotics investigations?

1 A. I have. That's our primary focus in the Drug
2 Enforcement Administration.

3 Q. If you had to guess, since 1998, approximately how
4 many investigations?

5 A. Hundreds, hundreds and hundreds of investigations.

6 Q. And have those investigations included investigations
7 related to cocaine?

8 A. Yes. Many involve cocaine, crack-cocaine.

9 Q. What about heroin?

10 A. Yes, heroin. The primary focus of Group 21 in
11 Philadelphia, which I'm the supervisor, is the heroin
12 enforcement group. Prior to that, I worked in the clandestine
13 laboratory group, and my main focus was cocaine and
14 crack-cocaine.

15 Q. What about methamphetamine?

16 A. Yes. Well, when I worked in the clandestine
17 laboratory group, we targeted methamphetamine traffickers.

18 Q. Have you, during the course of your career, had
19 occasion to work in an undercover capacity?

20 A. I have. Throughout my career, I've purchased
21 cocaine, crack-cocaine, and heroin in an undercover capacity.

22 Q. Now, when you're purchasing those narcotics that you
23 just named, from whom are you purchasing?

24 A. I'm purchasing from a distributor.

25 Q. There's a distribution chain in a drug network,

SPECIAL AGENT UPDEGRAFF - DIRECT ON VOIR DIRE

1 correct?

2 A. Yes.

3 Q. At what level are you making purchases as an
4 undercover?

5 A. That would depend on the investigation. I've done
6 investigations where I've purported myself to be a user of
7 crack-cocaine or heroin. I've done investigations where I've
8 purported to be a mid-level trafficker purchasing an ounce or
9 4-and-a-half-ounce quantities of cocaine.

10 Q. Have you had occasion to seize narcotics?

11 A. I have.

12 Q. Have you had occasion to become familiar with the
13 ways in which illegal drugs are packaged and shipped?

14 A. Yes, I'm very familiar with that.

15 Q. Have you had occasion to seize narcotics
16 paraphernalia?

17 A. I have.

18 Q. And have you had occasion to arrest drug traffickers?

19 A. I have.

20 Q. In the course of your work as a drug investigator,
21 have you interviewed drug traffickers?

22 A. Yes.

23 Q. At what levels did those drug traffickers operate?

24 A. I've had interviews with drug traffickers down from
25 street level users up to transnational drug distributors.

1 Q. Did you discuss with them their knowledge of drug
2 trafficking?

3 A. Yes. That's where we primarily gain a lot of our
4 intelligence, through interviewing narcotics traffickers, down
5 from the street level to learn the terms and the pricing
6 quantities, and up through transnational violators who give us
7 the wholesale prices coming from the source nations.

8 Q. Have you had occasion to decipher coded language?

9 A. Yes.

10 Q. And in what context?

11 A. In the context of undercover capacity interviewing
12 violators. That's part of our job. That's part of the
13 on-the-job training. Coded language can be geographically
14 dependent. It can be -- there are some coded language that is
15 universal in the drug game, as we call it, or the drug
16 investigative.

17 So a lot of times the coded language comes from me as
18 being an undercover, me interviewing individuals, me reviewing
19 tapes of confidential sources who are speaking with
20 traffickers, from confidential sources themselves, from Title 3
21 intercepting, intercepting text messages and intercepting phone
22 calls, where we can determine the language that the individuals
23 are talking about.

24 Q. You just mentioned Title 3 and intercepting. It's
25 what is known as a wiretap, correct?

SPECIAL AGENT UPDEGRAFF - DIRECT ON VOIR DIRE

1 A. That's correct.

2 Q. That includes voice communications?

3 A. Yes.

4 Q. Any other type of communications?

5 A. Text communications.

6 Q. So you've actually deciphered coded language in text
7 messages prior in your career?

8 A. Yes. I've been the affiant on Title 3 intercepts
9 where we've intercepted tens of thousands of calls.

10 Q. Based on your experience, are you familiar with how
11 narcotics are imported to the Philadelphia area?

12 A. I am.

13 Q. And are you familiar with how narcotics are sold in
14 the Philadelphia area?

15 A. I am.

16 Q. And you're familiar with the coded language used to
17 describe narcotics and drug paraphernalia?

18 A. Yes.

19 Q. Are you familiar with the types of weapons used by
20 drug traffickers?

21 A. I am.

22 Q. And have you ever testified in a court of law as an
23 expert witness in the area of drug trafficking?

24 A. I have.

25 Q. Approximately how many times?

1 A. In excess of 35 times.

2 Q. And in this court?

3 A. Yes, in the court in the Eastern District of
4 Pennsylvania.

5 Q. And those cases involved cocaine?

6 A. Yes, a myriad of drug types, cocaine, crack-cocaine,
7 heroin, marijuana.

8 Q. Do you see that in front of you, Special Agent
9 Updegraff? I'm showing you what's been marked as Government
10 Exhibit 3005.

11 A. I do.

12 Q. What do you recognize that to be?

13 A. My curriculum vitae, or my resume.

14 MR. STENGEL: Your Honor, move to admit Government
15 Exhibit 3005.

16 THE COURT: Admitted.

17 (Exhibit G-3005 admitted into evidence.)

18 BY MR. STENGEL:

19 Q. We don't need to go through this really at all,
20 Special Agent Updegraff. Does this fairly and accurately
21 represent your training and experience?

22 A. It does. The first page represents some of the
23 duties I do as assigned, and the other pages represent my
24 training.

25 MR. STENGEL: Your Honor, subject to any voir dire by

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1 the defense, I offer Special Agent Randy Updegraff as an expert
2 in the area of narcotics and narcotics trafficking.

3 THE COURT: Any defense counsel wish to examine the
4 witness on his credentials? All right. You may proceed then.

5 Ladies and gentlemen of the jury, as I said with
6 other witnesses, this witness is an expert witness. He
7 qualifies because of his specialized training, and he will be
8 allowed to state opinions as well as facts. So you may
9 consider his testimony as an expert along with the general
10 rules about every witness, their credibility and weight being
11 up to you.

12 Go ahead.

13 MR. STENGEL: Thank you, Your Honor.

14 - - -

15 DIRECT EXAMINATION

16 - - -

17 BY MR. STENGEL:

18 Q. Special Agent Updegraff, do you know the term "source
19 state"?

20 A. I do.

21 Q. And what do we mean by a source state?

22 A. We at DEA, we make determinations of how the illicit
23 narcotics are ingressed or shipped into the US. We consider
24 the southwest border to be source states for specific types of
25 illicit substances: California, Arizona, New Mexico, and

1 Texas.

2 Q. You mentioned California. For what narcotics is
3 California a source state?

4 A. The whole gambit, cocaine, heroin, methamphetamine,
5 fentanyl, marijuana.

6 Q. What about crack-cocaine?

7 A. Not typically. Crack-cocaine is derived from cocaine
8 hydrochloride. It's usually manufactured at the end-user
9 facility.

10 Q. We're going to come back to that in a minute. What
11 about methamphetamine? Has methamphetamine traditionally come
12 in from a source state like California?

13 A. When I started in drug law enforcement,
14 methamphetamine was typically manufactured in the locality
15 where you did your investigations by a certain demographic,
16 usually biker gangs. It was manufactured here by a certain
17 method.

18 Over the last 10 to 15 years, the Mexican drug
19 cartels have cornered the market on manufacturing high-quality
20 methamphetamine. They obtain the precursor chemicals from Asia
21 due to the limited oversight on materials coming into Mexico by
22 the Government, and they manufacture large quantities of
23 methamphetamine and a very high purity on an industrial scale.

24 Q. Is it common for different drugs to be shipped
25 together?

1 A. Typically, you would see a load that's being
2 transported over land through the southwest border area into
3 the United States as being a single entity, but sometimes we
4 see some drugs commingled.

5 Q. What is an example of drugs that you often see
6 commingled?

7 A. We would see kilogram quantities of cocaine along
8 with pound quantities of methamphetamine.

9 Q. Do you have knowledge or an opinion as to why that
10 is?

11 A. I do. I have an opinion on that. It's been my
12 experience that the cocaine comes from South America. It comes
13 from the Colombians. The coca plant's only indigenous to three
14 nations, Colombia, Bolivia, and Peru, and it's manufactured in
15 South America.

16 As the cocaine makes its way into the United States,
17 it's either done through the eastern Pacific or through the
18 Caribbean or through Mexico. As it makes its way through
19 Mexico, the Mexican cartels take control of the cocaine, and
20 they're the ones that ingress it into the United States. The
21 Mexican cartels are the ones that are manufacturing the pound
22 quantities of methamphetamine, so they're using the same
23 transportation routes to deliver the Colombian cocaine and the
24 methamphetamine into the US.

25 Q. And why are they doing that?

1 A. The coca plant is an organic substance. It depends
2 on the weather, and it's derived from the leaves of the coca
3 plant. So it's an organic substance that's manufactured, like
4 I said, depending a lot on the weather.

5 Whereas the methamphetamine is a synthetic substance
6 that is just made by mixing chemicals together, not dependent
7 on any kind of outside influences. So the methamphetamine is
8 being pushed through with the cocaine due to the fact that it
9 can be easily made with the synthetic substances, and also
10 they're manufacturing at a very cheap rate in Mexico.

11 Q. Is the distribution network for cocaine more
12 established than that of methamphetamine?

13 A. Well, the distribution methods have changed over the
14 years since I first started. The Colombian cartels used to
15 ingress the cocaine directly into the US, but due to law
16 enforcement activity and the military assisting us, they've got
17 to where they sell the cocaine. They move the cocaine from
18 Columbia, either through the Eastern Pacific via submersibles
19 or airplanes, into South America and then, consequently, into
20 Mexico, where they move it over land, typically into the US.

21 The distribution routes have changed because the
22 Mexicans -- the Colombians want to limit their exposure to US
23 law enforcement. So they sell the cocaine to the Mexican
24 cartels, and they take the risk of ingressing into the US.

25 Q. Once it's into the US, how do drug traffickers get it

1 from California to, say, Philadelphia?

2 A. That's left up to the imagination. That's left up to
3 the imagination of the trafficker. I've seen it shipped in
4 luggage, shipped on trucks in commodities, shipped in trucks in
5 a duffel bag just thrown in the cab of the truck, mailed
6 through the mail, mailed through UPS or DHL, driven over in
7 vehicles. It's just left up to the imagination of the
8 trafficker.

9 Once the cocaine kilograms enter into the US, they
10 usually enter in a large quantity, and from that point at the
11 source states along the southwest border, they're divided up
12 into different trafficking groups and then shipped throughout
13 the US.

14 The price of cocaine increases the further it gets
15 into the continental United States. Down in Colombia, a
16 kilogram of cocaine would be approximately two to \$3,000. As
17 it makes its way into Central America or Mexico, it could be
18 6,000. As it makes its way up to the southwest border, it's,
19 like, 15,000 for the kilogram.

20 Now it makes it into the US. It's going to be in the
21 low to mid \$20,000 at the source states. So that's the -- once
22 it makes its way to a place like the streets of Philadelphia,
23 it's going to be between 36 and \$38,000 for a kilogram. So you
24 see that the price increases due to the risk with the
25 transportation and the risk to exposure.

1 Q. Are you familiar with the term "mule"?

2 A. I am.

3 Q. What's a mule?

4 A. A mule is a common term used for an individual that
5 will transport drugs from point A to point B.

6 Q. We're talking about a distribution network of illegal
7 narcotics, right?

8 A. Yes.

9 Q. In essence, these are individuals, these are people?

10 A. Yes, and a reference to a mule would be.

11 Q. So please describe for the jury sort of the structure
12 of a drug trafficking organization.

13 A. It would be my experience that a narcotics
14 trafficking organization would have a specific hierarchy. It
15 would have an individual at the head of it, which would have
16 access to resources and have access to a source of supply, or a
17 street term would be a plug, have an access to an individual
18 that would give them availability to the kilos of cocaine or
19 the pounds of methamphetamine.

20 That hierarchy is going to have other individuals in
21 it that are below the top that have certain specific jobs,
22 either to keep the money and count the money, to keep the
23 drugs, divide up the drugs, put them in certain types of
24 configurations for resale, a mule that would transport the
25 drugs, and then down to lower level street-level sellers.

SPECIAL AGENT UPDEGRAFF - DIRECT ON VOIR DIRE

1 The advantage to the top of the hierarchy getting
2 closer to the source country is purely economics. If you're
3 paying \$35,000 for a kilo here in Philadelphia, wouldn't it be
4 better to go to LA and pay 25? Wouldn't it be better to meet
5 someone from Mexico that could give it to you for 15?

6 So that's the quest, in my experience, the quest of a
7 narcotics trafficking group, is to get the cheapest price of
8 the product from the closest spot to the source nation, and
9 then as they move it into the interior of the US, the profit
10 margin will increase.

11 Q. So given that we're talking about an illegal
12 distribution network, how is it that drug traffickers prevent
13 detection by law enforcement?

14 A. Narcotics traffickers, they not only have to worry
15 about law enforcement, they have to worry about rival entities
16 in the trade who would like to have their proceeds and their
17 contraband for themselves. They use various methods, switching
18 up cell phones, using aliases, having stash locations, vice
19 places where they reside. There's a myriad of techniques that
20 they try to avoid detection by law enforcement and other
21 rivals.

22 Q. And coded language included?

23 A. That's correct, yes.

24 Q. What about the use of multiple cars to travel?

25 A. I've seen that before where individuals will have a

1 trail car behind a vehicle where they'll either -- sometimes
2 they'll have a car following an empty car with the money.
3 Sometimes, on the way back, they'll have a car following behind
4 the car that's loaded or the vehicle that's loaded with the
5 contraband just to try to, number one, to keep tabs of it
6 because it's quite a bit of an investment; number two, to try
7 to physically keep law enforcement from being able to get in
8 behind that car to make a vehicle stop.

9 Q. Does the term "trap" mean anything to you?

10 A. It does. Trap has a couple connotations to me in the
11 narcotics game. It has -- trap could be clavo, Spanish. It's
12 a hidden compartment in a vehicle, a compartment where drugs or
13 guns could be secreted in any type of vehicle. I've seen them
14 in trucks, cars, minivans.

15 Trap also has, in relation to me, trap means a sale
16 of narcotics.

17 Q. Do drug traffickers, from your experience, use traps,
18 the first definition you talked about, the hidden compartment?

19 A. Yes, yes.

20 Q. You had mentioned rival entities earlier. What sort
21 of additional steps or steps do drug trafficking organizations
22 take to protect their business from rival entities?

23 A. Have locations where they think are safe and also
24 protect those locations with firearms.

25 Q. What about violence?

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1 A. Yes.

2 Q. What sorts of -- what would a drug trafficker use a
3 digital scale for?

4 A. Digital scales, they typically look like a little
5 kitchen scale to weigh out your broccoli or anything, but they
6 have them for gram quantities going up to kilogram quantities.
7 They're used for redistribution of the illicit substance,
8 whether it be cocaine, crack-cocaine, or methamphetamine.

9 Q. If you find a residue of a particular narcotic on a
10 scale, what does that tell you as a drug investigator?

11 A. As an investigator, that would lead me to believe
12 that the distribution group was using that to weigh out that
13 specific substance for redistribution.

14 Q. What about heat-sealers, do you know what they are?

15 A. I do.

16 Q. What is a heat-sealer?

17 A. Heat-sealers, you'll see them utilized along with the
18 FoodSaver paper, that textured plastic that's often utilized to
19 secrete quantities of narcotics and seal back up once they're
20 being prepared for redistribution.

21 I've also seen kilograms come with the heat-sealer.
22 If I see a kilogram or obtain a kilogram with the heat
23 FoodSaver paper around it, it tells me that -- it doesn't come
24 from Colombia like that. It makes it from Colombia to Mexico
25 in, like, bales of 25 kilos. And that tells me that the

1 transportation group somewhere along the southwest border broke
2 up a larger portion and put it -- used the FoodSaver bags to
3 try to defeat law enforcement K-9 from smelling the cocaine
4 scent.

5 Q. Are heat-sealers used for any particular type of
6 narcotic?

7 A. No. Across the board.

8 Q. And what about money counters?

9 A. I'm familiar with money counters. Drug trafficking
10 is a very lucrative trade. Individuals that have large
11 distribution networks acquire a lot of cash, and I've seen
12 money counters utilized to count that cash.

13 Q. I'm going to talk a little bit about -- we have some
14 text messages that you have reviewed, correct?

15 A. That is correct.

16 Q. I'd like to go through those. Before we get into the
17 specifics, I just want to talk about some of the standard
18 breakdowns in weights of narcotics.

19 A. Sure.

20 Q. So you had mentioned kilogram quantities earlier,
21 correct?

22 A. Yes.

23 Q. Approximately how many -- just so we're all clear
24 here, how many grams are in a kilogram?

25 A. Sure. I can do the -- do you want me to do the whole

1 breakdown at this time?

2 Q. Go for it, and if I need to follow up, I will.

3 A. Sure. When cocaine is manufactured in Colombia.
4 It's manufactured as cocaine hydrochloride. It's then
5 typically packed in these laboratories in Colombia into
6 kilogram blocks. The nickname for them on the street would be
7 a block, a brick, a bird. But that's a kilogram, which is 1000
8 grams. It's approximately 9 inches by 6 inches by about an
9 inch and a half?

10 And it's wrapped in various types of things. You'll
11 see it wrapped in rubber inner tube. You'll see it wrapped in
12 all kinds of different types of tape, like electrical tape,
13 packing tape. It's specific to the manufacturing cartel in
14 Colombia.

15 Once that kilogram makes it to the US and it's 1000
16 grams, if it makes it the whole way to Philadelphia in that
17 form, the thousand-gram form, it's typically broken down once
18 it gets to Philadelphia for redistribution.

19 That can be -- distribution networks here in
20 Philadelphia, they have a few options at that point. They can
21 take that kilogram and what we call flip it. If they bought it
22 in California and paid 25, they could find somebody to buy it
23 for 35 here in Philly. They've made 10,000 on that kilo.

24 Or they can take option two and break it down. And
25 what they would typically do here in Philadelphia is take the

1 thousand kilograms, take it out of the wrapping, mix it with an
2 inert substance, a lot of times similar-looking to cocaine, an
3 inert substance such as inositol. They will take that and
4 maybe, for argument's sake, put a thousand grams of inositol
5 with a thousand grams of cocaine, mix it all together, take it
6 and, on the street they call rerock it, or put it back
7 together. They would put it in two -- now you have 2,000 grams
8 of this illicit substance.

9 Coca typically comes from Colombia in about 84 to
10 94 percent purity. It varies by the cartel. So if they put a
11 thousand grams on that, they're going to divide their quality
12 in half, but it's still usable on the streets where the users
13 could still use it.

14 So what I find is individuals will take the
15 2,000 grams, they will repress it or rerock it into two things
16 that look similar to the kilograms now. It's just going to be
17 lower purity, but by looking at it, you could not tell it was
18 any different. It's all going to be just the white powder.
19 They rerock it using a form that's similar. It's a 6 by 9 by
20 inch and a half form where they will press the cocaine.
21 Acetone is used in the manufacturing process. A lot of times
22 individuals will use acetone spray on it to use as a binder to
23 put it back together. So now you have 2 kilograms of cocaine
24 where that's your investment.

25 So when you break it down, say if you singularly take

1 the kilogram and break it down, it would then be broken down
2 into first a 500-gram quantity. A kilogram is 36 ounces, or
3 1000 grams. So if you just take the singular kilo, break it
4 down into 500-gram quantities, that's going to be 18 ounces.

5 The next step, you would be breaking it down to
6 9 ounces, 250 grams. Cocaine is typically broken down
7 incrementally from 1000 to 500 to 250. Then it's broken down
8 into a 4 and a half or 125 grams, which has some nicknames on
9 the street, a dirt bike, a point, a dot, different nicknames
10 for that 125-gram quantity.

11 Post 125-gram quantity, the next increment is going
12 to be a 62.5-gram quantity, or a 62nd Street or a deuce.
13 They're broken down into next-level quantities. So now it's
14 62 grams for distribution.

15 The next level would be down, in my experience, would
16 be down to ounce quantities. The term on the street could be
17 an O or an onion or a circle. There's hundreds of names that
18 individuals use. That ounce quantity is 28 grams.

19 Broken down past the ounce quantity would be into
20 half-ounce quantity, or 14 grams, sometimes referred to here in
21 Philadelphia as a geographic term, a Broad Street, due to the
22 number 14.

23 Then broken down into a quarter ounce, which would be
24 7 grams. Sometimes hear it referred to as a quarter or a
25 Michael Vick. And then down to 3.5-gram quantities. That's

1 referred to on the street as an eight ball.

2 Q. So you just went kilogram, half kilogram, quarter
3 kilogram, or 9 ounces, a 62.5, a 28-gram, which is an ounce,
4 14 grams, 7 grams, and 3.5 grams. Those are cocaine
5 measurements, correct?

6 A. Yes. My experience, that's how cocaine is cut up.

7 Q. What about crack, how is crack cut up?

8 A. First, crack would have to be manufactured out of
9 cocaine hydrochloride, but it's cut up similarly.

10 Q. Similarly. I know. It's still a little early.

11 We're going to get to this point about crack having
12 to be made from cocaine, but, in essence, the measurements for
13 crack and for cocaine on the street, in your experience, are
14 the same?

15 A. Yes, it's been my experience.

16 Q. And so while we're on it, let's talk about it. How
17 is crack made out of cocaine?

18 A. When the cocaine -- cocaine is manufactured in South
19 America in Colombia. It's the manufacturing process getting
20 from the alkaloids out of the leaves. At one point due to
21 the -- they introduce gasoline. They introduce dry cement.
22 They introduce all this other process. It makes it into a coca
23 paste or a coca base at that time.

24 That laboratory will then send it to a finishing lab
25 or a cocaine hydrochloride lab, which will then take and

1 introduce hydrochloric acid gas to the coca paste substance
2 within a liquid that will salt out. That's what makes the
3 white powder.

4 As the cocaine gets to the US in the kilogram form
5 and is out to the distribution groups that now want to make
6 crack, they just reverse the process by adding a sodium
7 bicarbonate or a base, baking soda, to the cocaine HCl. Along
8 with the water and heat, it will extract the impurities and the
9 cocaine salt, making it now a non-water soluble form into a
10 smokeable form.

11 In its salt form, cocaine HCl is water soluble, so it
12 can be snorted and it can even be injected. Crack-cocaine is
13 now in a base form where it's non-water soluble. It has to be
14 smoked through a pipe. The smoking is the more efficient way
15 of having -- the impact of the narcotics on the central nervous
16 system is more efficient by the smoke going into the
17 capillaries of lungs.

18 Q. And are there any slang terms you know for best
19 manufacturing process of cocaine into crack-cocaine?

20 A. Yeah. Whip it up, drop it, cook it, terms like that.

21 Q. So we just talked about the weights for cocaine and
22 crack-cocaine. What about heroin?

23 A. Heroin weights are usually done on a different basis.
24 Heroin will come to the US in kilogram form. As it gets here,
25 it's typically -- what we see and it's been my experience, that

1 heroin is cut up as it's diluted for redistribution. It's cut
2 up into increments of ten, like gram quantities. You'll see
3 heroin being sold for 100 grams, 50 grams, 60 grams.

4 It doesn't -- it doesn't have the same methodology
5 utilized as the traffickers use with cocaine, in my experience.
6 It's usually divided up. You won't hear someone asking for a
7 Broad Street of heroin, typically. It's usually in incremental
8 gram quantities with a base of ten, has been my experience.

9 Q. What about methamphetamine?

10 A. Methamphetamine is imported into the US in pound
11 quantities, and it's been my experience that that is broken
12 down usually in pound to ounce quantities.

13 Q. Let's say, like, a user amount of methamphetamine.

14 A. It would be gram quantities. Ounce being 28 grams.
15 User quantity would be gram quantities.

16 Q. When you use the term ounces of methamphetamine, what
17 are some slang terms for an ounce?

18 A. Oh, for an ounce of meth?

19 Q. Yeah, sure.

20 A. A zip.

21 Q. Zip?

22 A. Zip.

23 Q. Is the word "zip" for other -- zip as a term of
24 measurement, is that used for any other drug for which you're
25 aware?

1 A. I'm not aware of any. I don't know.

2 Q. Have you heard it in the context of marijuana?

3 A. I have not.

4 Q. Let's talk about the drugs seized in this case for a
5 moment. You have met with the agents sitting at counsel table,
6 correct?

7 A. That's correct.

8 Q. You've read some police reports and drug lab reports
9 correct?

10 A. Yes.

11 Q. So I'm going to represent to you that on
12 September 11, 2017, the following items were seized from 3234
13 North Sydenham Street: Approximately 62 grams of crack,
14 approximately 48 grams of methamphetamine, 24 glassine packets
15 containing heroin, approximately 229 grams of bulk heroin, a
16 money counter, a heat-sealer, and approximately \$8,000 cash.
17 Additionally, several large bags of marijuana were found.

18 Do you have an opinion as to whether the crack seized
19 from that address on that date is consistent with distribution
20 or personal use?

21 A. I do. I have an opinion that that would be
22 consistent with distribution due to the quantity, the 62 or the
23 62nd Street.

24 Q. And do you have an opinion as to whether the
25 methamphetamine seized from 3234 Sydenham Street was consistent

1 with distribution as opposed to personal use?

2 A. I do. If I'm not mistaken, approximately 48 grams
3 would be just shy of 2 ounces. I would make an opinion that
4 that would be -- it is consistent with distribution.

5 Q. Do you have an opinion as to whether the heroin
6 seized from 3234 Sydenham Street on September 11 was consistent
7 with distribution as opposed to personal use?

8 A. Heroin is utilized in 0.03-gram increments, so you
9 could get approximately 20, 25 user quantities out of 1 gram.
10 So that would be 25 times 229. So that would be a significant
11 amount of user portions. So my opinion would be that that's --
12 that 220-some grams was consistent with distribution.

13 Q. For all three of those substances, you mentioned the
14 quantity of the substance. Are there any other circumstances
15 that affect your opinion?

16 A. Yeah, the presence of the paraphernalia and the money
17 counter.

18 Q. Now, speaking of heroin, as they relate to heroin, do
19 the letters "OG" mean anything to you?

20 A. No.

21 Q. You don't know them to be a standard measurement for
22 heroin?

23 A. No.

24 Q. A standard name for heroin?

25 A. No.

1 Q. Represent to you that the following items were seized
2 from inside a hidden compartment in a Chevy Impala parked
3 outside of 3234 Sydenham Street on September 11, 2017. Inside
4 that Impala was approximately 370 grams of cocaine and
5 160 grams of crack. In your expert opinion, are these items
6 consistent with distribution or personal use?

7 A. I would find that due to the quantities, both of
8 those items are consistent with distribution.

9 Q. Represent to you that the following items were seized
10 from apartment 717 of the One Water Street Apartments around
11 May 17, 2018. That apartment complex is located at 250 North
12 Columbus Boulevard.

13 Approximately 10 kilograms of cocaine, between 5 and
14 6 pounds of 98 percent pure methamphetamine, \$20,000 cash heat
15 sealed in one of the packages of methamphetamine, a digital
16 scale, and a heat-sealer.

17 Do you have an expert opinion as to whether these
18 substances are consistent with distribution or personal use?

19 A. I would find the quantities would be consistent with
20 distribution.

21 Q. Let's talk for just a moment about the value of that
22 cocaine and methamphetamine. You said a price earlier. A
23 price for a kilogram of cocaine in a source state like
24 California?

25 A. In the low to mid \$20,000. 23 to \$25,000 per

1 kilogram.

2 Q. And if that cocaine is then brought back to
3 Philadelphia, how much would a kilogram of cocaine sell for in
4 Philadelphia?

5 A. If the organization just did a flip and just sold the
6 kilo as a whole, it would be worth about between 35 and \$38,000
7 per kilogram.

8 Q. So we're talking about, 10 kilograms in a source
9 state like California, 230,000 to \$250,000?

10 A. Correct.

11 Q. And then you could turn around and flip it without
12 rerocking it and make about a hundred thousand dollars?

13 A. Yes. That's my opinion.

14 Q. Let's talk about the value of that methamphetamine.
15 What's the cost of a pound of methamphetamine in a source state
16 like California?

17 A. Methamphetamine, due to the influx and the industrial
18 production that the Mexican cartels are doing, it's
19 approximately 2,000 to \$2,200 in a source state like
20 California.

21 Q. And if you were to sell that here in Philadelphia,
22 how much money would you make?

23 A. In investigations that I'm familiar with in
24 Philadelphia, if we purchased pound quantities of
25 methamphetamine from trafficking groups, anywhere from four to

1 \$8,000 per pound, depending on the familiarity and how good a
2 customer we were.

3 Q. To be clear, both of those calculations you just did
4 are if they're flipped in bulk quantities, correct?

5 A. That is correct.

6 Q. But if you break them down, right, and you sell
7 individual user amounts or midlevel distribution amounts,
8 what's going to happen to your profit?

9 A. It's going to skyrocket.

10 Q. We talked earlier about a PowerPoint that we're going
11 to go through here and you have reviewed, correct?

12 A. Yes, sir.

13 Q. Now, I just want to talk, before we get into the
14 nitty-gritty on those text messages, as an investigator, could
15 you just describe your process for decoding coded language or
16 how do you crack the code?

17 A. Certainly. As an investigator, this investigative
18 team, obviously, you have a -- when you go into an
19 investigation, you have a baseline of knowledge on the
20 violators that you're going to investigate. That's how you
21 started the investigation, either through confidential source
22 information, undercover purchases, maybe a local police unit
23 made a stop on an individual that purchased from this
24 organization. So you have a baseline of what the group or
25 organization, what level of violators they are, what amounts of

1 drugs that they're selling, what kind of drugs they're selling.

2 So once you have that, then you have an institutional
3 knowledge of the names of certain types of drugs, like
4 marijuana, kush or sour or weed or trees. Cocaine is soft.
5 You know, crack is hard. Cocaine is the white girl. Heroin is
6 the boy. Methamphetamine is glass, window, ice. So you kind
7 of -- you have a baseline knowledge of the terms.

8 Where it gets more difficult is during the course of
9 the investigation where you have a trafficking group that is
10 geographically located that uses terms that are specific to the
11 group. So once you have that, you continue to hear these new
12 terms and you take indicators to decipher these terms, whether
13 they're talking about soft in a decimal or hard in a decimal or
14 any of the things that you don't know.

15 So you first go back and you try to -- you match the
16 name of that term up maybe with a monetary value that's known
17 to you for a portion of the illicit substance. So there's all
18 kinds of things that you do. And sometimes you may not know
19 what that terms means on day one and you won't know until day
20 12 of your investigation, but then you can go back to day one
21 through 12 and say, oh, when they were talking about X here,
22 that's what they meant. That's what they meant. That's what
23 they meant. That's how we extrapolate the quantities
24 attributed to individuals.

25 Q. In essence, you take a fixed term, a known term.

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1 Then you build off that, correct?

2 A. Correct.

3 Q. I'd like to talk about a few of those known terms
4 based on your extensive training and experience.

5 What does the term "hard" mean?

6 A. Hard to me means crack-cocaine.

7 Q. And what does "soft" mean?

8 A. Soft to me means cocaine hydrochloride or cocaine
9 powder.

10 Q. Do you often see those two terms together?

11 A. I see violators asking for which do you want, hard or
12 soft.

13 Q. Why do you think crack is hard?

14 A. Crack is hard because it's physically hard.

15 Q. Why is cocaine soft?

16 A. Because it's physically soft.

17 Q. What about snow?

18 A. That's another term. There's probably 500 terms for
19 cocaine powder, snow being one of them.

20 Q. And glass?

21 A. Glass is a reference to me -- it means to me
22 methamphetamine.

23 Q. Glasses?

24 A. Same.

25 Q. Window?

1 A. That's another reference to glass, methamphetamine.

2 Q. Ice?

3 A. Same, methamphetamine.

4 Q. To be clear, it's not just methamphetamine, right?

5 If I give you a particular type of methamphetamine,

6 d-methamphetamine that's 80 percent pure, to the DEA, what is

7 that known as?

8 A. It's known -- in the Controlled Substance Acts, it's
9 known as ice. It's a delineation made for methamphetamine
10 that's in excess of 80 percent pure. But ice is a generic term
11 that a lot of people use for methamphetamine.

12 Q. A generic term with a legal basis, yeah?

13 A. Correct.

14 Q. What about dog food?

15 A. Dog food's a name for heroin in Philadelphia.

16 Q. Now, there's also -- there's slang and coded terms
17 for the substances that are being sold, correct?

18 A. Correct.

19 Q. And there's also slang -- you started to go into some
20 of them earlier about amounts, correct?

21 A. Yes.

22 Q. What does a brick mean to you?

23 A. A brick means to me a kilogram of cocaine, specific,
24 brick, bird.

25 Q. What about a dot?

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1 A. Dot to me, a dot, in my experience, has been a point
2 or 125 grams of crack-cocaine or cocaine.

3 Q. So dot and a point, same thing, both mean 125 grams
4 of crack or cocaine?

5 A. Yes, in my experience.

6 Q. A 62nd Street?

7 A. 62nd Street, to me, means a 62.5 grams of cocaine or
8 crack-cocaine.

9 Q. A deuce?

10 A. A deuce is the same to me, 62.5 grams of cocaine or
11 crack-cocaine.

12 Q. We mentioned this earlier, a zip?

13 A. A zip is a unit of measure, in my experience, as
14 relating to an ounce. There's also dozens of those, circles,
15 O, onion, many.

16 Q. We talked about this earlier. Being a Philly guy,
17 right, what's west of 13th Street, east of 15th Street?

18 A. It's Broad Street. That's 14. That's a connotation
19 for 14 grams of cocaine or crack-cocaine.

20 Q. If you're in Chester, what's 14 grams called?

21 A. Nelson.

22 Q. Why?

23 A. Jameer Nelson was a basketball player from Chester.
24 He wore the number 14.

25 Q. What about -- you mentioned earlier a Mike Vick.

1 What's a Mike Vick?

2 A. Mike Vick is 7 grams of cocaine or crack-cocaine due
3 to the number Michael Vick wore for the Falcons and the Eagles.

4 Q. A commonly used term, eight ball, what's an eight
5 ball?

6 A. Eight ball is an eighth of an ounce of cocaine or
7 crack-cocaine. It's 3.5 grams, which is an eighth of an ounce.

8 Q. And a bundle?

9 A. A bundle is, in my experience here in Philadelphia,
10 will be between 13 and 14 user amounts baggies of heroin
11 bundled with a black rubber band.

12 Q. I'd like to go through some of -- with the terms in
13 mind we just discussed, I'd like to go through some of the
14 PowerPoint slides you have discussed?

15 MR. STENGEL: Permission to show the witness
16 Exhibit 3004?

17 THE COURT: Ladies and gentlemen of the jury, just
18 one word about this exhibit. You may recall last week I
19 mentioned something about the use of summaries to compile
20 evidence, and this is another summary that the Government has
21 prepared that is in the nature of a summary.

22 Now, you have heard a lot of testimony from various
23 witnesses about the content of different Instagram postings and
24 also telephone calls that were intercepted or were retrieved
25 from somebody's cell phone, and that's the underlying basis.

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1 Now, I believe it's the Government's position that
2 this document, this summary, is an accurate compilation of
3 those bits and pieces of evidence that have now been put
4 together into this exhibit and will be testified to by this
5 witness.

6 So it's for you to determine the accuracy and the
7 weight which to give to this summary exhibit, but I'm telling
8 you that our procedure allows one party, any party to a case,
9 to compile voluminous evidence into a summary and to present it
10 to the jury as a summary of the evidence for the jury's
11 consideration.

12 All right. You may I proceed.

13 MR. STENGEL: Thank you, Your Honor.

14 BY MR. STENGEL:

15 Q. Do you see that document in front of you, Special
16 Agent Updegraff?

17 A. I do.

18 Q. And what do you recognize it to be? A PowerPoint
19 presentation, right?

20 A. Yes.

21 Q. It was prepared by Special Agent William Becker,
22 correct?

23 A. It was.

24 Q. If you could flip to the next page, please, do you
25 see that next page?

1 A. I do.

2 Q. Is there a conclusion on that page?

3 A. Yes.

4 Q. And is that your conclusion?

5 A. Yes.

6 Q. Previously, you were shown what has been marked as
7 Government Exhibit 3002.

8 MR. HUGHES: Objection. Leading, Your Honor.

9 THE COURT: Overruled. Finish the question.

10 BY MR. STENGEL:

11 Q. I'll represent to you that 3002 is this PowerPoint
12 presentation without that conclusion. Were you previously
13 shown that PowerPoint presentation?

14 A. Yes.

15 Q. And then we've added your conclusion to this,
16 correct?

17 A. Correct.

18 MR. STENGEL: Your Honor, move to admit Government
19 Exhibit 3004 as a summary exhibit.

20 THE COURT: Admitted.

21 MR. HUGHES: Objection, Your Honor. There's been
22 insufficient foundation laid for the basis of that conclusion.

23 THE COURT: You can cross-examine the witness about
24 that. Overruled. The document is admitted. It can be shown
25 to the jury.

(Exhibit G-3004 admitted into evidence.)

BY MR. STENGEL:

Q. Special Agent Updegraff, we met prior to this trial, correct?

A. Yes, sir.

Q. And we went through a PowerPoint presentation compiled by Special Agent Becker, correct?

A Yes

Q. Approximately how many times did we meet?

A. Five or six.

Q. And approximately how much time do you think we spent going through this PowerPoint presentation?

A few hours

Q. Just a few. And based on that review and based on your conversations with the agents sitting right here at counsel table, did you come up with the conclusions rendered on this PowerPoint presentation?

A. I did. I made my conclusions based on information that I had not only from the PowerPoint presentation but from other documents that I was made available to from the investigators.

Q. Sure. You had questions and we answered them, right?

A. Yes, sir.

Q. So looking at this first slide -- and I'll represent to you that the texts of these slides have already been read

1 into evidence, so we don't have to read them word for word.

2 But I do want to go through your conclusions here a bit.

3 On September 22, 2017, there's a text message with
4 Defendant Jamaal Blanding and someone by the name of Rock. You
5 have concluded that that's 2 ounces of methamphetamine being
6 sold by Jamaal Blanding to Rock. Why?

7 A. Due to the individual known as Rock asking if there's
8 any glasses around, my interpretation of that was it was --
9 Rock was asking Mr. Blanding for methamphetamine. Rock goes on
10 to tell Mr. Blanding he needs two zips. My interpretation of
11 that would have been 2 ounces. I concluded that Rock wanted
12 2 ounces of methamphetamine from Mr. Blanding.

13 Q. Let's go to the next one, 9/25/2017, please, and your
14 conclusion for this slide is what?

15 A. That Rock is asking for a 1 ounce of methamphetamine.

16 MR. STENGEL: Let's go to the next slide, please.

17 BY MR. STENGEL:

18 Q. This is a text message exchange between Defendant
19 Jameel Hickson and Defendant Jamaal Blanding, and your
20 conclusion is what?

21 A. My conclusion was, in my experience, this would be
22 asking for a pound of methamphetamine.

23 Q. Why is it that you concluded this text message is
24 referring to a pound of methamphetamine?

25 A. Mr. Hickson asks Mr. Blanding: I need one of the ice

1 joints. That tells me that Mr. Hickson is looking for
2 methamphetamine. Mr. Blanding responds: Whole one? He
3 doesn't make a reference to a zip or any other quantity. He
4 makes reference to a whole one, and in my experience, a whole
5 one would be a pound quantity.

6 Q. Are you familiar with the amounts of narcotics -- the
7 amounts of methamphetamine, in particular, that were seized as
8 part of the investigation of this case?

9 A. I am. It was in excess of 6 pounds or right around
10 6 pounds.

11 MR. STENGEL: Let's go to the next slide, November 1,
12 2017.

13 BY MR. STENGEL:

14 Q. Your conclusion here is what?

15 A. My conclusion is the individual is asking for dog
16 food, or heroin, and he asks for a dime. My interpretation of
17 that would be approximately 10 grams due to my experience with
18 heroin being sold in, like, increments of ten.

19 Q. I don't want to cut too far ahead of us here, but at
20 the end of this slide, is there a summary of all of these
21 amounts per defendant?

22 A. Yes.

23 MR. STENGEL: Let's go to the next one --

24 THE COURT: Where is that?

25 MR. STENGEL: I'm sorry. It's the very last page,

1 Your Honor.

2 Let's go to the next page.

3 BY MR. STENGEL:

4 Q. Here we have from the same --

5 THE COURT: I think it's important, just for the
6 jury's information, that you will ask the witness at the very
7 end of this for his total.

8 Your total is on the last page. I don't want to jump
9 ahead, but that's just a simple process of addition of all
10 these individual entries; is that correct?

11 THE WITNESS: Yes, Your Honor.

12 THE COURT: All right. I'm just saying that so I
13 don't think -- the jury, you're welcome to make notes whenever
14 you want, but I think you can have the benefit of now knowing
15 that, before this witness finishes, he will give you a total
16 that he has compiled for each defendant.

17 Is that correct?

18 THE WITNESS: Yes, Your Honor.

19 MR. STENGEL: You and I were on the same page.

20 THE COURT: I think the jury should know that ahead
21 of time. Now, the question is whether you feel the need to go
22 through each individual page or you can just get some general
23 explanation and then get the total because the jury will have
24 the document with them and they can consider it, subject to any
25 cross-examination.

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1 MR. STENGEL: Your Honor, absolutely. My plan was to
2 go through a few just so we get a sense of it and then skip
3 over a few. There's are a couple that we're going to want to
4 go through because they're a little bit more in depth, but
5 absolutely, Your Honor.

6 BY MR. STENGEL:

7 Q. So here we have a text message on the same day,
8 November 1, 2017, and you have found that Jamaal Blanding has
9 sold 1 ounce of methamphetamine to an unknown individual. Why
10 is that?

11 A. On this first page of the slide, the individual's
12 representing to Mr. Blanding that he had grabbed the ice a
13 couple times. My interpretation of that was this individual
14 had purchased methamphetamine from Mr. Blanding.

15 Q. And then on the next page, down there at the bottom,
16 we have a term for -- what do we see at the very bottom?

17 A. Once the conversation was -- Mr. Blanding recognized
18 who this individual is, at the bottom, that individual tells
19 him I'm going to have my folks come get an OZ, or an ounce.

20 MR. STENGEL: Let's go to the next one from
21 November 21, 2017.

22 BY MR. STENGEL:

23 Q. Your conclusion is Abdul West sells 62 grams of crack
24 or cocaine to somebody named Ali via Hans Gadson. First off,
25 why is it crack or cocaine?

1 A. In my experience, these increments, the 62, is where
2 I form my opinion from, that this be an increment of cocaine or
3 crack-cocaine. And also the price. Where you go down further
4 and you see Bras got it, referring to Mr. Gadson, you see
5 1,950. That tells me that that's consistent with my experience
6 being the price for 62.5 grams of cocaine or crack.

7 Q. There's nothing in this text that allows you to
8 determine whether they're talking about crack or cocaine,
9 right?

10 A. I can't differentiate.

11 Q. So in your total at the end, which we'll read, how
12 have you accounted for this?

13 A. It's parsed out.

14 Q. So it's either a total for crack, a total for
15 cocaine, or a total for crack or cocaine?

16 A. Yes.

17 MR. STENGEL: Let's go to 11/27/2017, please, and
18 this is a 2-page slide.

19 BY MR. STENGEL:

20 Q. At the very top, your conclusion is what? What's the
21 conclusion here?

22 A. That Mr. Gadson provided a count to Mr. West of
23 37 grams of crack-cocaine.

24 Q. What's a count?

25 A. My interpretation of this is that Mr. West, due to my

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1 review of these texts, revealed to me, it's my opinion, that
2 Mr. Gadson was subservient to Mr. West, and Mr. West was asking
3 Mr. Gadson how much Mr. Gadson had on hand.

4 A count would be, from a hierarchy of trafficking,
5 the boss is going to want to know how much cocaine and/or money
6 is on hand at the distribution point.

7 Q. You see that number at the top, the 37.3/1,250.
8 What's the 37.3 mean to you?

9 A. That means a weight of crack-cocaine.

10 Q. And the number afterwards means what?

11 A. 1,250 represents to me a monetary value, \$1,250.

12 Q. Now, are you able to tell, just from this part of the
13 conversation, what narcotic they're talking about?

14 A. Not specifically at this part.

15 Q. So if we go down to the next page down there at the
16 bottom, what do you see?

17 A. I see Mr. Gadson telling Mr. West: From now on,
18 every hardware play I make, I'm going to shoot the count.

19 That means to me that Mr. Gadson is going to tell
20 Mr. West when he's selling crack, when he has made a sale of
21 crack, and report the count.

22 MR. STENGEL: Let's go to the next page, please.

23 BY MR. STENGEL:

24 Q. Here the conclusion is Abdul West sells 14 grams of
25 cocaine to Ali. Why?

1 A. The first line, you want to come get it and take it
2 to Maine to popcorn, popcorn is a reference to crack-cocaine in
3 my experience, and this individual's asking for 7th Street,
4 which would refer to a quarter ounce. Mr. West responds that
5 he has 14 on him, and my interpretation of that would be he has
6 14 grams of cocaine on him.

7 MR. STENGEL: Let's go to the next slide, please.

8 BY MR. STENGEL:

9 Q. Now, we had just referenced -- we talked about a text
10 from earlier where Mr. Gadson says every time I make a hardware
11 play I'm going to shoot you the count, right?

12 A. Yes.

13 Q. So here we see a count, correct?

14 A. Yes.

15 Q. What's the number at the bottom mean?

16 A. That's Mr. Gadson telling Mr. West the amount of
17 crack-cocaine that's available at the distribution point, two
18 62nd Streets, which is 125 grams, and one dot or one point,
19 which is 125 grams, for a total of 250 grams.

20 MR. STENGEL: Let's go to 12/7, please. Let's skip
21 one.

22 BY MR. STENGEL:

23 Q. Now, we see here -- what's your conclusion here?

24 A. My conclusion there is, from Mr. Blanding's other
25 communications with individuals --

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1 Q. Let me stop you right there, Mr. Updegraff. Is your
2 conclusion, as reflected on this slide, accurate? Is this your
3 actual conclusion?

4 A. No.

5 Q. What is your conclusion with this slide?

6 A. My conclusion is that the individual or Mr. Blanding
7 is looking for an ounce of methamphetamine.

8 Q. Do you know that term "Versace" is? Is that one
9 that's familiar to you?

10 A. Versace to me has a connotation -- it's unique to me
11 to this trafficking group. It's unique to me. But I make that
12 assertion having connected it with glass, ice, glasses,
13 Versace, glasses. And zip being a term that was frequently
14 used by Mr. Blanding talking about ounce quantities of
15 methamphetamine, that's how I made my assertion.

16 MR. STENGEL: Let's go to the next slide, 12/27/2017.

17 BY MR. STENGEL:

18 Q. Now, we have here a reference to, yo, tell OG we
19 ready for him and texts an image, correct?

20 A. Yes.

21 Q. And then say this is a ticket for half.

22 MR. STENGEL: If we could go to that image, please?

23 THE WITNESS: Yes. This is Mr. Gadson asking
24 Mr. West the price of 500 grams of cocaine, and he puts in
25 15,600. Ticket is a common term used for cash, ticket or

1 price.

2 BY MR. STENGEL:

3 Q. And this 15,600 number we saw on the next page,
4 that's a commonly known price increment for you?

5 A. That would be low.

6 Q. That would be low?

7 A. 15,600 would be low. That would be 31,200, which
8 would be -- for a kilo, it would be very cheap in Philly.

9 MR. STENGEL: Let's go to the next one, 12/25/2017.

10 BY MR. STENGEL:

11 Q. What do we see here? Let me ask you, this term
12 "decimal" we see here, is that known to you prior to this?

13 A. No, it was not.

14 Q. How did you go about figuring out what this
15 organization uses the word "decimal" to mean?

16 A. This slide or this text gave me the insight on that.
17 I originally thought, by looking at it in the totality, that a
18 decimal was referring to a point or a dot, which would be
19 125 grams.

20 But by looking at this slide, you have the
21 individual, Mr. Gadson, providing the hardware count, providing
22 the amount of crack, and he relates that he has one
23 62nd Street, which is 62.5 grams. Then I subtracted it. And
24 then he gives a total of 93.1 with the bag.

25 Typically, a bag will weigh a gram. So I took and

1 subtracted a couple bags and then subtracted the 62 and came up
2 with about 28, 29 grams, so now the code the decimal was clear
3 to me that it was for an ounce.

4 MR. MEEHAN: I'm sorry. I didn't hear his answer.

5 BY MR. STENGEL:

6 Q. If I understand correctly, a 62nd Street and a
7 decimal, so 62.5 grams and then an unknown amount, right?

8 A. Yes.

9 Q. And then gives a more specific amount, 93.1 grams
10 with the bag?

11 A. Yeah. That was my interpretation, that the
12 62nd Street was 62 grams. Then the total was 93 grams with the
13 bag.

14 Q. So if you subtract the 62nd Street from the 93.1
15 total, you have the remainder, which would be the decimal,
16 correct?

17 A. Yes.

18 Q. And that's approximately 28 grams or an ounce?

19 A. That was my interpretation.

20 Q. To be clear, that's your interpretation, right?

21 A. That's my interpretation, yes.

22 Q. It's based on your training and your experience and
23 looking at the context?

24 A. Yeah. My original thought, as looking at it, was
25 that it was for a much higher quantity.

1 MR. STENGEL: Let's go to 12/26/2017, please.

2 BY MR. STENGEL:

3 Q. Here we have a reference -- this is Hans Gadson
4 providing a count to Abdul West: It's a 62nd Street left from
5 the old batch.

6 Does the term "batch" mean anything to you?

7 A. Batch would give me a connotation that an amount of
8 substance or a substance that was manufactured, that's what
9 gives the connotation to me, that it was manufactured or that
10 it's crack.

11 MR. STENGEL: Let's go to the 12/28/2017, please.

12 BY MR. STENGEL:

13 Q. So here we have Jamaal Blanding selling an unknown
14 amount of methamphetamine. Why is this an unknown amount of
15 methamphetamine?

16 A. Ice was clear to me, but the term "teenager" was not
17 clear to me on the amount. I could not decipher that amount.
18 There was no indications about pricing or anything to give any
19 more clues. I'm confident that they're speaking about
20 methamphetamine, but teenager I did not know.

21 Q. So where you encountered a text where you didn't have
22 some other context or some other clue, you didn't add that to
23 the total at the end, right?

24 A. Correct.

25 MR. STENGEL: 12/28/2017, next one.

1 BY MR. STENGEL:

2 Q. Again, here we see Hans Gadson providing a count to
3 Abdul West, correct?

4 A. Yes.

5 MR. STENGEL: Let's go to 1/4/2018, please.

6 BY MR. STENGEL:

7 Q. The term here at the top, what does a Maybach mean to
8 you?

9 A. A Maybach means to me -- a Maybach is a top-end car
10 made by Mercedes-Benz. It's made in different models, a 57 and
11 a 62, a Maybach 62. I'm familiar with the term "Maybach,"
12 meaning 62 grams of cocaine or crack-cocaine.

13 MR. STENGEL: Let's go to 1/6/2018.

14 BY MR. STENGEL:

15 Q. Now, we've seen a series of text messages and we've,
16 frankly, skipped over a few with Hans Gadson providing a count
17 to Abdul West, and you have labeled those as crack-cocaine,
18 correct?

19 A. Yes.

20 Q. And that was based on an initial text message where
21 Hans Gadson said, every time I make a hardware play, I'm a
22 shoot you the count?

23 A. That's correct.

24 Q. Here we see a reference to hardware but in a
25 different connotation, correct?

1 A. Yes.

2 Q. So just describe, please, for the jury how you
3 interpreted this text message.

4 A. I interpreted this text message to mean that
5 Mr. Gadson was telling Mr. West that he had a 62nd Street, or
6 62.5 grams, and a decimal, or 28 grams, and everything's the
7 same on the hardware.

8 So this indicated to me that these individuals had
9 other forms of communication that they were reporting, that
10 Mr. Gadson was reporting to Mr. West the availability of what
11 was on deck or what they had available to sell and monetary
12 values, that they were using some other form of communication.

13 Because he relates that he has 90 grams, and it seems
14 to me here that it's cocaine because he's differentiating and
15 saying the number is the same on the crack, the hardware. The
16 number is the same. So it appeared to me that they had
17 conversations relating to that.

18 Q. But your conclusion is just that there's 90 grams of
19 cocaine, right?

20 A. Yes.

21 Q. Why don't you have a conclusion as to the amount of
22 crack they're talking about here?

23 A. Mr. Gadson doesn't delineate the number.

24 Q. He just says everything's the same?

25 A. Correct.

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1 MR. STENGEL: Let's go to 1/6/2018, a note from
2 Jamaal Blanding's phone, please.

3 BY MR. STENGEL:

4 Q. In your training and experience as a drug
5 investigator, what do you recognize this to be?

6 A. This appears to me to be an owe sheet or a tally
7 sheet.

8 Q. And you have reached a conclusion based on this tally
9 sheet. What's your conclusion?

10 A. It's represented on this sheet that Mr. Blanding's
11 indicating that he has \$14,000 at the crib, or at his
12 residence, 5 pounds of ice or methamphetamine, and these other
13 numbers indicate to me like a running tally on people that owe
14 Mr. Gadson money.

15 MR. GOLDMAN: Mr. Gadson?

16 THE WITNESS: I'm sorry. Pardon me. Mr. Blanding.

17 MR. GOLDMAN: I just wanted to correct that.

18 THE WITNESS: Thank you, Counselor.

19 MR. STENGEL: Next one, 1/8/2018 .

20 BY MR. STENGEL:

21 Q. Here again we see a text with Mr. Gadson and
22 Mr. West, and now, again, he says hardware the same, but you're
23 able to reach a conclusion here. Why?

24 A. Because Mr. West asks for the exact number of the
25 crack, the exact quantity of the crack available. Mr. Gadson

1 indicates how much, and I made a conclusion that the top
2 addition, the seven deuces and a decimal, were powder cocaine
3 because Mr. Gadson told Mr. West that the hardware was the
4 same, but then Mr. West goes and -- he either forgot or didn't
5 remember the exact quantity, so he asked for the exact quantity
6 of the crack available, 75.6 grams.

7 MR. STENGEL: Go to 1/11/2018 .

8 BY MR. STENGEL:

9 Q. Here again is one where you were not able to
10 determine whether it was cocaine or crack-cocaine, correct?

11 A. Correct. You have an individual asking -- Tone
12 asking for 14th Street, and the dollar signs represented to me
13 that he wanted a price on 14 grams. Well, he actually says it
14 in the next text down. Mr. West tells him that it will be 500,
15 which is consistent with the price of 500 grams of cocaine or
16 crack-cocaine, and he indicates that Mr. Gadson has it.

17 Q. The next two texts, let's go through these quickly.
18 Here we have Abdul West asking for a count, Hans Gadson sending
19 him a count, correct?

20 A. Yes.

21 Q. You've now determined this to be, in your opinion,
22 crack-cocaine why?

23 A. We did. Using the methodology from 11/27 when
24 Mr. West asked for the count, unless he differentiated, that he
25 wanted the crack count. That's the methodology that we used.

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1 Q. And this next slide is the same thing, yeah?

2 A. Correct.

3 MR. STENGEL: Let's go to 1/25/2018. We're going to
4 skip over a couple here.

5 BY MR. STENGEL:

6 Q. Do you see this?

7 A. I do.

8 Q. Here you have concluded that Hoover, alleged
9 co-conspirator Richard Chase Hoover, orders a pound of
10 methamphetamine from Jamaal Blanding. Why did you reach that
11 conclusion?

12 A. The first, where Mr. Hoover is saying how much for
13 the window that we were talking about, Mr. Blanding indicates
21. In my interpretation of that, I would -- reading further
14 on in the text message, you can tell their location. They're
15 representing that they're in California. The price for
16 methamphetamine would be approximately \$2,100 for a pound in
17 California. So I interpreted that 21 to mean \$2,100.

19 MR. STENGEL: Let's go to 1/26/2018, Gadson to West.

20 BY MR. STENGEL:

21 Q. Here, again, we're shooting the count: I got a Broad
22 Street left. We're in Philadelphia. What's a Broad Street?

23 A. 14 grams.

24 MR. STENGEL: Next slide.

25 BY MR. STENGEL:

1 Q. Another count?

2 A. Correct.

3 MR. STENGEL: Let's go to 2/11/2018, Hans Gadson
4 providing a count to Abdul West.

5 BY MR. STENGEL:

6 Q. So here he's asking for both hardware and software,
7 correct?

8 A. Yes.

9 Q. And you were able to determine or you were able to
10 issue an opinion on which number is which here. How did you
11 get to that opinion?

12 A. Okay. You initially have Mr. West asking Mr. Gadson
13 hardware and software. So I interpreted that to be he's asking
14 for a count. He responds -- Mr. Gadson responds to Mr. West:
15 One 62nd Street left/79.6 left with the bag.

16 Then Mr. Gadson indicates: I just got a Broad Street
17 off. That indicated to me that Mr. Gadson just sold 14 grams.

18 Then Mr. West asked him: So now what's the hardware
19 count? What's the count on the crack?

20 Then Mr. Gadson replies: It was 86.6 before the
21 Broad Street. Now it's 72.6. So he subtracted the 14 grams.

22 Then he says: I'm on my way to 7th Street now. So
23 that means he has a sale for 7 grams of crack. So now it's
24 down to 65.6, which is in proximity to 62nd Street.

25 So I determined that there was originally 86.6 grams

1 of crack, and then the 79 grams were powder cocaine.

2 Q. In essence, on this first text from Mr. Gadson, which
3 is the second line, when he says 62nd Street, he had already
4 done the math for the sale he just made and the sale he's about
5 to make?

6 A. That's my interpretation.

7 MR. STENGEL: Let's go to 2/12/2018.

8 BY MR. STENGEL:

9 Q. He says: I got two racks on me you can come get.

10 You've concluded that's two racks of heroin. What
11 does that mean?

12 A. I made this conclusion due to my familiarity with
13 heroin distribution in Philadelphia. I made this conclusion
14 solely on the term "racks." There's no other indications of
15 the price or anything, a rack of heroin being 10 bundles of 14
16 or 13, so approximately 260 user packages of heroin.

17 MR. STENGEL: Let's go to the next page 2/15/2018.

18 BY MR. STENGEL:

19 Q. Here we see the first one: Yo, bull, can we meet
20 down 62nd Street.

21 Right?

22 A. Correct.

23 Q. And then there's a, yeah, and then a, where you at,
24 and Mr. West says 2323 Race Street.

25 What do you interpret this to mean?

1 A. This individual is asking Mr. West for 62 grams,
2 62nd Street being 62 grams.

3 Q. So they're not trying to meet on 62nd Street?

4 A. That's not my interpretation.

5 Q. Where are they going to meet?

6 A. 2323 Race Street.

7 MR. STENGEL: Let's go to 2/17/2018, Hans Gadson
8 provides a count to Abdul West.

9 BY MR. STENGEL:

10 Q. Now, here we have Mr. West asking specifically for
11 the software count, correct?

12 A. Yes.

13 Q. And so you've made a finding that that's cocaine?

14 A. Yes.

15 Q. How much?

16 A. 90 grams.

17 MR. STENGEL: Let's go to 3/12/2018, please.

18 BY MR. STENGEL:

19 Q. This is a fairly long text message between Abdul West
20 and Daryl Baker. It says: Folks lost the game by 14, bro.

21 What does that mean to you?

22 A. That means to me that Mr. Baker is complaining that
23 when individuals that purchased the powder cocaine cooked it
24 into crack-cocaine, they lost 14 grams on the return when they
25 manufactured it due to cut being added to the powder cocaine

1 they received.

2 Q. So the process we described earlier of cooking
3 cocaine into crack-cocaine, right?

4 A. Yes.

5 Q. What do you lose in that process?

6 A. You lose the cut and the salt, the HCl.

7 Q. The impurities?

8 A. The impurities, yes.

9 Q. So then there's: I'm not complaining, bro. Then
10 there's some back and forth. Let's go to the next page.

11 Mr. Baker says: I been through the sewers. 3,750 is the
12 average ticket for top-level guys.

13 What does 3,750 for the average ticket mean to you?

14 A. That to me, that's a monetary value. 3,750 is the
15 average price for top-level guys for a quantity of
16 approximately 125 grams.

17 Q. Then there's the next: I say that to say that we
18 have the same ticket, but it's a better result with others who
19 keep it clean.

20 Just interpret that for us, please.

21 A. Mr. Baker is complaining that he's paying the same
22 price, the same ticket being the same price, but he's getting a
23 better return when they manufacture the cocaine and the
24 crack-cocaine with others who keep it clean, with other
25 distributors who don't add so much dilutant to the powder

1 cocaine.

2 MR. STENGEL: The next slide.

3 BY MR. STENGEL:

4 Q. It says: Man, I broke two boxes of cereal down, and
5 I only took out one and I only took what we used to take, 7 and
6 3.5. It's all we had left of that stuff, so it's impossible
7 that someone lost 14.

8 What does that mean to you?

9 A. To me, cereal boxes is not, like, a known to me. I
10 can only infer that from the further description that Mr. West
11 makes about he took 7 and 3.5 because that's all we had left of
12 the stuff. It's not uncommon for individuals, when they break
13 down the cocaine, if they've broken it off the kilo, to add a
14 dilutant to it before they resell it.

15 And in this point, Mr. West is saying he broke down
16 two units, and I only took out of one. That means he only took
17 the cocaine out of one and replaced it with 10.5 grams of a
18 substance, of an inert substance, because that's all he had
19 left of the stuff, all he had left of the inositol or the cut
20 that he used.

21 So he's telling Mr. Baker that he didn't mess with it
22 that bad, that he didn't put that much cut on it, so it's
23 impossible that they lost 14 grams when he only put 10 grams of
24 cut in there.

25 MR. STENGEL: Let's go to the next one.

1 BY MR. STENGEL:

2 Q. It ain't slow because we only been on it for a week,
3 and it's almost done. That's because of me losing sleep,
4 arguing with my wife. I put nothing before the thing. Ten
5 about to be gone.

6 Where did you base your conclusion of 10 kilograms of
7 cocaine?

8 A. I base this conclusion on the -- by my review of the
9 information supplied by the investigators on the totality of
10 this organization, and that that's the -- that's my opinion of
11 what Mr. West is talking about here, that he is talking about I
12 put nothing before the thing, referring to I put nothing
13 before, in my interpretation, nothing before selling, selling
14 drugs, and ten about to be gone. Due to the quantity of the
15 conversation that I was reviewing leading up to this led me to
16 believe that he was referring to kilograms at this point.

17 MR. STENGEL: So let's jump ahead to 3/17/2018, one
18 more, one more. Yeah, here we go.

19 BY MR. STENGEL:

20 Q. So here again we see this reference to cereal box
21 that was just referenced, right?

22 A. Right.

23 Q. So you had determined what cereal box was by an
24 internal reference to a price, correct?

25 A. Yes. At one point, yeah, it was the price of 3,750.

1 Q. Is that what you based your opinion on here?

2 A. Yes.

3 MR. STENGEL: Go to April 1, 2018.

4 BY MR. STENGEL:

5 Q. This is Hans Gadson texting Jamaal Blanding: You got
6 a whole situation on the Curry tip. Blanding responds: Trey
7 O's. How did you interpret that text exchange?

8 A. I interpreted that -- it appears to me that even
9 Mr. Blanding wasn't sure what Mr. Gadson was asking. A whole
10 situation, I interpreted a situation to be an ounce of this,
11 and a Curry tip I related to a basketball player, Steph Curry.
12 He shoots a lot of three-pointers. So I think myself and
13 Mr. Gadson were kind of asking the same thing, like, is it Trey
14 O's. Trey O's to me meant 3 ounces.

15 MR. STENGEL: Let's go to 4/14/2018 .

16 BY MR. STENGEL:

17 Q. What do we see here?

18 A. Individual Sheen is asking Mr. West if he can get
19 62.5 grams. Mr. West replies affirmative and tells him an
20 individual, gives him a name, a nickname, and then also the
21 price is consistent with the price for 62.5 grams of cocaine or
22 crack-cocaine.

23 Q. In my haste, we might have skipped over a text
24 previously with Sheen. How is it that you got to the
25 conclusion that they're referring to cocaine here?

1 A. There was an earlier text where the individual known
2 as Sheen was complaining to Mr. West about the quality of the
3 cocaine he received when he manufactured it into crack-cocaine.
4 So I made an interpretation that any time the individual known
5 as Sheen was asking Mr. West for a quantity, it was for powder
6 cocaine.

7 MR. STENGEL: Let's go to just the last couple,
8 5/3/2018 with Atlantic City.

9 BY MR. STENGEL:

10 Q. You interpreted this to be what?

11 A. I interpreted it to be 125. The 4.5 is four and a
12 half. A four and a half is a terminology for 125 grams of
13 cocaine or crack-cocaine.

14 MR. STENGEL: Let's go to the next slide.

15 BY MR. STENGEL:

16 Q. It's the same kind of conversation, correct?

17 A. Yes. Here's where I gathered the information about
18 the price for the four and a half, 3,750 is consistent.

19 Q. Again, your conclusion for this text exchange is 4
20 and a half ounces of crack-cocaine, correct?

21 A. Yes.

22 Q. Another text on 5/4/2018, again, an exchange with
23 Atlantic City: Yo, sup, tomorrow be through, grab nine shirts.

24 Mr. West says: I'm a be off for a week. I'm a hit
25 you next time it's around. You got to load up while it's here.

1 How did you interpret that?

2 A. I interpreted that to mean the Atlantic City
3 individual was asking for nine shirts, or 9 ounces. That's an
4 interchangeable term I've seen used before, 9th Street, nine
5 shirts, 9 ounces of coke.

6 Q. And based on all of the text messages that we have
7 gone through and the ones that -- we sort of skipped over a few
8 here, correct?

9 A. Yes.

10 Q. Based on all of those and your conclusions for each
11 individual one of those texts, did you come to a summary
12 amount?

13 A. Yes.

14 MR. STENGEL: Can you please go to the next slide?
15 BY MR. STENGEL:

16 Q. Can you please read the summary amounts that you have
17 attributed in these text messages to Defendant Abdul West?

18 A. 2,631 grams of crack-cocaine, 11,766 grams of
19 cocaine, 582 grams of either crack-cocaine or cocaine,
20 7.8 grams of heroin.

21 Q. Where we see that either crack-cocaine or cocaine,
22 that's due to text messages where you were not able to
23 determine from the context whether they were discussing powder
24 cocaine or crack-cocaine, correct?

25 A. Correct.

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1 Q. Now, how about the totals for Jamaal Blanding?

2 A. 62 grams of crack-cocaine, 77 grams of either
3 crack-cocaine or cocaine, 3,397 grams of methamphetamine,
4 10 grams of heroin.

5 Q. What about Defendant Jameel Hickson?

6 A. 453 grams of methamphetamine.

7 Q. And Defendant Hans Gadson?

8 A. 2,631 grams of crack-cocaine, 1,131 grams of cocaine,
9 534 grams of either crack-cocaine or cocaine, 112 grams of
10 methamphetamine.

11 MR. STENGEL: One moment, Your Honor.

12 THE COURT: Yes.

13 No further questions, Your Honor.

14 THE COURT: Okay. Ladies and gentlemen, let me just
15 check with counsel.

16 How many of you want to cross-examine the witness?

17 All right. All right. Ladies and gentlemen, I think
18 we'll take our mid-morning break at this point. Please
19 remember to keep an open mind. Ten minutes. We'll try to keep
20 it to ten minutes. Thank you very much.

21 (The jury exits the courtroom at 10:37

22 a.m.)

23 THE COURT: Okay. Ten-minute recess.

24 MR. WITHERELL: Your Honor, I'd like to bring
25 something to the Court's attention. I brought this up

1 yesterday. I've then re-asked. Pursuant to Rule 16, I believe
2 I am entitled to a written summary of the expert witnesses,
3 their opinions, and what they're based on, that the defense is
4 going to bring. I've requested it. I have not received it
5 from either defense counsel.

6 THE COURT: We've had one expert.

7 Mr. Hughes, who is calling the next expert?

8 MR. HUGHES: I'll call Mr. Leff, Your Honor.

9 THE COURT: What about the written summary?

10 MR. HUGHES: Your Honor, we haven't gotten the same
11 from the Government.

12 MR. WITHERELL: You absolutely have.

13 MR. HUGHES: This PowerPoint slide that's been
14 changed four times, this isn't an expert report, and it's still
15 changing.

16 MR. WITHERELL: Under Rule 16 --

17 THE COURT: I wish you have raised this earlier. I
18 don't know how they can do it between now and calling the
19 witness.

20 MR. WITHERELL: I did raise this earlier, Your Honor.
21 I raised this yesterday and I asked them. I need to know what
22 they were planning on testifying to.

23 THE COURT: Can you make an offer of proof?

24 MR. HUGHES: Your Honor, Mr. Witherell emailed me
25 last night. I emailed him back and I told him that Mr. Leff

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1 intends to -- takes issue with some of the opinions that
2 Special Agent Updegraff has made today. That's all.

3 MR. WITHERELL: That's exactly what I got, that he
4 takes some opinion that's different. I'm entitled to know what
5 his opinion is.

6 THE COURT: Here's what we're going to have to do.
7 And this may prevent closings today, but we'll see how it goes.
8 I'm going to allow the defense witness to testify, and then you
9 may be able to call Agent Updegraff for rebuttal. Okay. I
10 don't know any other way to do it. Okay. All right. I don't
11 think either party is severely prejudiced by how this has been
12 playing out.

13 MR. WITHERELL: Your Honor, I'm not claiming that I'm
14 prejudiced. I'm still just asking for that written summary,
15 before they take the stand, just to what their opinion is.

16 MR. ORTIZ: We've been very flexible with this, which
17 has been a cornerstone of their case, and it keeps changing.
18 He couldn't even make an opinion based on this.

19 THE COURT: I'm not going to require a written report
20 at this point. Ten-minute recess.

21 Do any of the defendants need to use the bathroom?
22 Mr. Hickson. All right.

23 (Recess taken from 10:40 a.m. to 10:55
24 a.m.)

25 THE COURT: Bring the jury in, please.

(The jury enters the courtroom at 10:56 a.m.)

THE COURT: Okay. Ladies and gentlemen, we're ready to continue with cross-examination.

Mr. Meehan.

— — —

CROSS-EXAMINATION

— — —

BY MR. MEEHAN:

Q. Good morning.

A. Good morning, Counselor.

Q. In looking at the total, in looking at your total, how do you resolve the occasions when Mr. West would be asking Mr. Gadson just for a count? Because that's not a sale. That's just a count, correct?

A. It was resolved by that was the amount of drugs on hand at the time reported by Mr. Gadson to Mr. West.

Q. Correct. But that would then be added into the total
that you had for Mr. West. Example.

MR. MEEHAN: Can we go to 11/21.

BY MR. MEEHAN:

Q. Now, this is an occasion where Mr. West is selling 62 grams. As you indicate, you're not sure whether it's crack or cocaine, but it's being sold to Ali, correct?

A. Yes, sir.

1 Q. Through Hans Gadson, correct?

2 A. Correct.

3 Q. Now, this would then be part of the total that we
4 have on the last page, and this would be 62 grams of the
5 455 grams of either crack-cocaine or cocaine, correct?

6 A. Oh, no. I think it would be represented as cocaine
7 for Mr. Gadson and Mr. West.

8 Q. So --

9 A. No, no. I'm sorry. You're correct, Counselor. It's
10 either/or, yes.

11 Q. That's why I chose this one.

12 A. Yes.

13 Q. So let's go to the next one. Now, the next one is
14 Mr. Gadson provides a count to Mr. West. Now, by the way, the
15 previous one that we looked at was on 11/21.

16 The next page that we're looking at is 11/27/2017,
17 and on this, it's interpreted as Mr. Gadson providing a count
18 to Abdul West of 37 grams of crack-cocaine, correct?

19 A. Yes, sir.

20 Q. Okay. Now, the reason that you identify it as
21 being -- let me take a step back.

22 When Mr. Stengel was going through and asking
23 questions about the packaging of different drugs, you indicated
24 that when it comes to powder cocaine or crack-cocaine, that
25 they use the same weights, correct?

1 A. Yes, that's accurate. Once you get down below
2 probably I would say the -- down to the quarter pound, down to
3 the 125-gram increments. It's not been my experience that
4 individuals are -- yeah, they use the same weights. They do.
5 They start at a kilo, but it wouldn't be typical for someone to
6 drop or cook a kilogram at a time. They would use
7 incrementally less at a time when they cook it due to the
8 manufacturing process. A kilo is kind of large to put in a pot
9 on the stove. So it's been my experience that individuals,
10 when they cook cocaine into crack-cocaine, they do it in
11 smaller increments.

12 Q. Okay. So we get down from a kilo into a half kilo,
13 correct? We then start breaking it down to even smaller
14 quantities, correct?

15 A. Yes.

16 Q. To the point where I think a dot would be 125 grams;
17 is that correct?

18 A. Yes. A dot or a point is, in my experience, been
19 125 grams.

20 Q. Okay. That would still be possibly powder or crack,
21 correct?

22 A. Yes. It could be referred in either way.

23 Q. So you'd have to be looking to other indicators to be
24 able to determine whether it's powder cocaine or crack-cocaine,
25 correct?

1 A. Exactly.

2 Q. The same would be true for a 62nd Street or a deuce,
3 correct?

4 A. It is.

5 Q. Generally, as you get smaller and smaller, it would
6 be fair to say that it's usually going to be crack-cocaine,
7 however, as opposed to powder cocaine, correct?

8 A. That's a generality, but I've seen powder cocaine
9 sold in smaller increments. But smaller increments lend to be
10 crack-cocaine, depending on the clientele.

11 Q. Okay. You're getting down into your eight balls and
12 that kind of stuff, correct?

13 A. Yes. I've seen both.

14 THE COURT: Just pull the microphone closer. Thanks.
15 BY MR. MEEHAN:

16 Q. Okay. Now, on 11/27, there is an entry where
17 Mr. Gadson is giving a count to Mr. West, and it's identified
18 as being 37 grams by you, in all probability because I believe
19 at the top he says 37.3/1250, correct?

20 A. Yes.

21 Q. Okay. Now, what's more pertinent that I want to talk
22 about is later on in the same text messaging for the 27th of
23 November, Mr. Gadson says: From now on, every hardware play I
24 make, I'm shoot you the count, correct?

25 A. Correct.

1 Q. And what that does is that for future texts that
2 you're evaluating, that's in the back of your mind, because
3 you're saying whenever he gives him a count, that you're going
4 to believe that pertains to hardware as opposed to software; is
5 that correct?

6 A. That's the methodology I used from reading this text.
7 That's the methodology I used moving forward. Unless it was
8 delineated otherwise as the software count, I interpreted it as
9 the hardware, unless there was other factors involved, for
10 example, the guy Sheen. He complained about the quality of the
11 coke, which led me to believe that they were dealing in powder
12 cocaine.

13 Q. But that's not necessarily the correct methodology,
14 correct?

15 A. It's the methodology that I feel comfortable with.

16 Q. Okay. But it's not a scientific certainty, correct?

17 A. Correct. What is certain to me is that they're
18 talking about cocaine in some form.

19 Q. We can agree on that. The disagreement is whether
20 it's, again, soft, as in powder, or hard, as in crack-cocaine.

21 A. Fair enough.

22 Q. Okay. Thank you. So, again, let's talk about this
23 37 grams. This 37 grams gets added in -- you make a
24 determination of crack-cocaine. Let's say that that's
25 absolutely correct, okay? That gets added into the total for

1 Mr. West. It also gets added into the total for Mr. Gadson,
2 correct, at the very end of the 2,643 grams of crack-cocaine?

3 A. I think that's accurate.

4 Q. Okay. However, the next day there is -- well, first
5 off there's actually no sale being made. This is just a count,
6 correct?

7 A. Yes. It's the amount of drugs that the organization
8 had on hand.

9 Q. Okay. So they have 37 on hand. On the 28th, this is
10 pretty straightforward.

11 MR. MEEHAN: Is that up there, 11/28?

12 THE TECHNICAL ASSISTANT: Yes.

13 MR. MEEHAN: Thank you.

14 BY MR. MEEHAN:

15 Q. Where Mr. West is selling popcorn, i.e., soft, i.e.,
16 powder to Ali, correct?

17 A. Popcorn would be a reference to crack-cocaine, but
18 Mr. West is telling him take it to Maine to popcorn. He's
19 saying cook it up. That's my interpretation of what he's
20 saying there. You can cook it up.

21 Q. So you believe that while popcorn is popularly a
22 crack-cocaine reference, that because he's telling him to cook
23 it up, you're figuring it's probably soft because why would you
24 cook it up a second time. Is that reasonably accurate?

25 A. That's exactly accurate.

1 Q. I've never heard that before. Thank you.

2 So what happens is that counts on the 14 grams
3 towards Mr. West for the powder cocaine, correct?

4 A. Yes.

5 Q. Okay. Now we get to the 29th, so on the 29th we're
6 two days past the 27th where there's a count for 37 grams of
7 crack-cocaine. It's now the 29th, and you have that Hans
8 Gadson provides a count to Abdul West of 250 grams of
9 crack-cocaine, correct?

10 A. Yes, sir.

11 Q. Okay. Now, you base the number on Mr. Gadson saying
12 two 62nds, one dot, correct?

13 A. I did.

14 Q. Okay. Which is basically just a fancy way of saying
15 125 grams two times, correct?

16 A. Yes.

17 Q. So 125 from the two 62nd Streets, and then again a
18 dot, based on your evaluation, is 125 grams, correct?

19 A. Correct.

20 Q. However, you are making a determination of it being
21 crack-cocaine for the sole reason that two days earlier
22 Mr. Gadson said that he would give you a count on hardware when
23 he makes a play?

24 A. That's exactly what I did.

25 Q. Okay. However, it's not necessarily hard as opposed

1 to soft, correct?

2 A. I just went by the methodology of Mr. Gadson telling
3 Mr. West that he was going to shoot him the count when he made
4 a hardware play. I don't think these gentlemen are talking in
5 a vacuum on these texts. I'm sure they're having other
6 communications. But that's the methodology that I used, and
7 that's my opinion.

8 Q. Okay. But also the 37 that is used or referred to on
9 the 27th could be part of the 250 on the 29th, correct?

10 A. Yes. It could be tally.

11 Q. Because we're talking two days difference, right?
12 We're talking two days difference?

13 A. Correct.

14 Q. So the 37 -- there's no reference to a sale on the
15 27th or the 29th. There's a reference to a sale on the 28th
16 for 14 grams. However, the 37 that's given as a count to
17 Mr. West on the 27th could still be part of the 250 grams that
18 Mr. Gadson is giving a count of on the 29th, correct?

19 A. I agree that's possible, but not probable.

20 Q. Do you have any reference of a sale?

21 A. No. These texts are just a snapshot from the phone.

22 Q. Right.

23 A. I would assume -- we've had instances in the texts
24 with you could tell that Mr. Gadson and Mr. West had spoke in
25 another means.

1 Q. Do you have that here?

2 A. Yeah. In one of these texts you can tell that --

3 Q. I'm talking about this little 27th, 28th, and 29th.

4 Do you have any reference that the 37 that he referred to on
5 the 27th of November isn't part of the 250 grams that he's
6 giving a count to Mr. West on the 29th of November?

7 A. No. Absolutely it could be part of it. It could be
8 part of the 250. The 37, they could have not sold that ounce
9 and a half over the two days and still had it on hand.

10 Q. Okay. So on the 30th, the next day, now we're
11 talking about Mr. Gadson giving a count on the 27th. We're
12 talking about Mr. Gadson giving a count on the 29th. And we're
13 talking about Mr. Gadson giving another count on the 30th. So
14 three counts in a 4-day period, correct?

15 A. Yes.

16 Q. And I know I'm belaboring the point, but bear with
17 me. On this day, Mr. Gadson gives a count of 500 grams of
18 crack-cocaine, correct?

19 A. Correct.

20 Q. And, again, you are making a determination -- well,
21 strike that.

22 A. Yeah, I'm making a determination. Yeah, I added the
23 37, the 250, and the five. The 37 and the 250 could be
24 comprised in the five. Very possible.

25 Q. Also, again, you're making a determination that it's

1 hardware because of what Mr. Gadson texted to Mr. West on the
2 27th that he would give him a count on the hardware after he
3 made a play, correct?

4 A. Precisely.

5 Q. Okay. However, when he says "when I make a play,"
6 that's when he makes a sale, correct?

7 A. Yes.

8 Q. There's no indication, at least from what you have in
9 front of you here, that between the 27th, the 29th, and the
10 30th, that Mr. Gadson made any play, i.e., sale, that would
11 have required him to give an update on the hardware, correct?

12 A. Not in this medium there are not.

13 Q. So this very easily -- maybe easily is a little too
14 much of a statement. But the 500 grams of crack-cocaine could
15 not only include the 37, the 250, but also it could be powder
16 as opposed to crack?

17 A. My estimation was made because of the -- what
18 Mr. Gadson said to Mr. West on the 27th. That's how my -- my
19 methodology is from that, from that statement.

20 Q. I appreciate that. But that doesn't mean it's
21 perfect, does it?

22 A. Oh, absolutely not.

23 Q. That doesn't mean that it's an opinion to a
24 scientific certainty, correct?

25 A. No. It's an opinion of me and my experience, but

1 definitely not scientific.

2 Q. And it could be mistaken?

3 A. I don't think so or I wouldn't be testifying about
4 it.

5 Q. Of course you wouldn't be testifying to it, but
6 nonetheless, nonetheless, your expert opinion as to the --
7 well, let's say this.

8 Before I brought it to your attention, had you
9 thought about whether the 37 and the 250 could be also part of
10 the 500, which is maybe being triple counted for the total of
11 200 -- or, excuse me, 2,643 grams of crack-cocaine? Had you
12 thought about that?

13 A. I hadn't thought about it because I thought this
14 organization was so prolific they would be selling that much.
15 That was my opinion.

16 Q. Right. So you were basing that, though, on
17 information that you had from team USA, right?

18 A. From the investigative team, yes.

19 Q. And they're giving you and they're telling you and
20 they're feeding you information about how prolific this is, and
21 then you start looking at actual numbers, right?

22 A. Yes.

23 Q. Okay. Impressive but not prolific, correct?

24 A. I think it's quite a bit of cocaine and crack-cocaine
25 being sold on the streets of Philly.

1 Q. Right. But where is any evidence that you have of
2 sales being made between the 27th, the 29th, and the 30th,
3 other than the fact that the amount that's on hand is
4 increased? Do you have any evidence of sales being made on
5 those days?

6 A. I do not.

7 MR. MEEHAN: Can we move forward to February?

8 BY MR. MEEHAN:

9 Q. Now, February 12, there is a litany of counts and
10 sales that are being made by Mr. West. There are counts that
11 are being given to him by Mr. Gadson between -- the first day
12 is, what, September 15 and February, and every single time when
13 Mr. West's name is mentioned it's either powder cocaine or
14 crack-cocaine, correct?

15 A. Could you show me the slides you're referring to?

16 Q. Sure. Okay. I'm sorry. On 2/12. I'm referring to
17 2/12/2018.

18 MR. MEEHAN: Do we have that? Thank you. Can we
19 show that to Agent Updegraff?

20 THE WITNESS: That's a reference to selling two racks
21 of heroin. Is that what you're talking about?

22 BY MR. MEEHAN:

23 Q. Correct. That's the only time heroin is ever
24 mentioned when Mr. West is involved, correct?

25 A. I know there was heroin recovered in the search

1 warrant, but mentioned in the text messages, yes. And this is
2 my interpretation of what my knowledge is about heroin on the
3 streets of Philadelphia, is that rack is a term for ten bundles
4 being about 130 bags per rack. That's where I made that
5 interpretation.

6 Q. There's no price mentioned there?

7 A. There is not.

8 Q. That's a little surprising. I mean, people are
9 selling drugs for money, correct?

10 A. Absolutely.

11 Q. Okay. And in this one, as opposed to just about
12 every other text message entry that we have, Mr. West is
13 actually reaching out to Garci, correct, as opposed to the
14 customer reaching out to Mr. Gadson or to Mr. Blanding or to
15 Mr. West? This is Mr. West reaching out to Mr. Garci, correct?

16 A. It is.

17 Q. Got two racks on me you can come get. Mr. Garci:
18 Okay. You downtown? Mr. West: I'm at the Lounge. Okay.

19 No price is ever mentioned, correct?

20 A. Yes.

21 Q. Okay. In all these other texts that you had that you
22 went through, Mr. West is never involved in any conversation
23 any text message conversation or sale of heroin, correct?

24 A. That's correct.

25 Q. Could you have made a mistake on your interpretation?

1 A. My interpretation of this is based solely on the term
2 "rack" and my familiarity with the term "rack." If rack has
3 another connotation to this trafficking group, yes, I could
4 have. But my interpretation was made on my experience of what
5 I know a rack to be on the streets of Philadelphia.

6 Q. The fact that there's no money mentioned and that
7 Mr. West is saying to Garci I got two racks for you, could that
8 mean that he has money for him, like, as in two stacks as
9 opposed to two racks?

10 A. I'm familiar with the term stack is a thousand
11 dollars. Possibly, yes.

12 MR. MEEHAN: Thank you. I have nothing else.

13 THE COURT: Okay. Mr. Hughes.

14 - - -

15 CROSS-EXAMINATION

16 - - -

17 BY MR. HUGHES:

18 Q. Good morning, sir.

19 A. Good morning, Counselor.

20 Q. Thank you. Special Agent Updegraff, you can have a
21 zip of soft, right?

22 A. Yes, because my interpretation of a zip is an ounce.

23 Q. So zip is not a substance-specific interpretation,
24 generally speaking. A zip is an ounce?

25 A. Yes. In this context, that was my interpretation.

1 Q. Just like an O or an onion, those are also ounce
2 codes, right?

3 A. Yes.

4 MR. HUGHES: Now, if we could go to the fourth slide
5 in on USA-3004.

6 THE TECHNICAL ASSISTANT: What date?

7 MR. HUGHES: I'm sorry. It's October 13, 2017.

8 BY MR. HUGHES:

9 Q. Now, in this particular -- on this particular slide,
10 the term "joint" is used. Now, we've -- I've heard of you by
11 reputation. We've gone through your resume. Extremely
12 experienced. You are extremely experienced specifically with
13 Philadelphia and drugs.

14 Have you ever heard the term "joint" thrown around
15 the same way that jawn is?

16 A. Yes.

17 Q. Okay. So this exchange on 10/13 where Jameel
18 allegedly -- Mr. Hickson allegedly is ordering a pound,
19 according to this slide, for Mr. Blanding, from what I gather,
20 it's being based on a joint and a whole one.

21 Can you explain how and why you are sure that that is
22 a pound?

23 A. Certainly. My interpretation, when the first line, I
24 need one of them ice joints, that tells me that he's looking
25 for a quantity of methamphetamine. Mr. Hickson -- I'm not sure

1 which way this phone goes. Which way does whole one go? I'm
2 not understanding that.

3 Q. So there's a few issues with this slide, actually,
4 and I was going to get to that. But focusing in on, you know,
5 the conversation, we'll get to the phone number portion of it,
6 but you personally did not review, say, days of conversation
7 between Mr. Hickson. Just for argument's sake, this is
8 Mr. Hickson and Mr. Blanding communicating. For argument's
9 sake we'll say it's stating that. But you have not reviewed
10 days before the 13th of October 2017 and days after of their
11 conversation, correct?

12 A. I reviewed the conversations that were set forth in
13 this slide, and I determined the whole one to mean a pound by
14 the previous Mr. Blanding when he referred to ounce quantities,
15 calling them zips. I made a determination about ice and a
16 whole one. I made a determination that, in my opinion, that I
17 thought these individuals were talking about pound quantities
18 of methamphetamine.

19 Q. Well, at no other time did anyone say "whole one" and
20 at no other time did anyone use the term "whole one" and
21 "joint" together, correct?

22 A. I think the other time whole one was used on a cereal
23 box, but not on a joint.

24 Q. Now, at no time did anyone -- in these slides here,
25 you know, the evidence that you're interpreting, did anyone

1 refer to specifically methamphetamine as a joint?

2 A. No. But ice joints, I need one of them ice joints,
3 that is a clear indication to me it's methamphetamine.

4 Q. Fair enough. But we have rather, you know, we have
5 drug amounts, and then we have half drug amounts and half of
6 the next highest amount, like 62nd Street, for instance. And
7 we see 62nd Street thrown around a lot. And 62nd Street is
8 62 grams?

9 A. 62.5, correct.

10 Q. So you would agree with me that 62nd Street is a
11 commonly used unit?

12 A. I would agree with you that it's a commonly used unit
13 in the distribution of cocaine and crack-cocaine, but not in
14 the distribution of methamphetamine. It's typical, that I've
15 seen in my experience, it's pound quantities down to ounce
16 quantities and maybe multiple ounce quantities. But most
17 methamphetamine doesn't follow the same methodology that
18 cocaine is done, in my experience, the way it's broken down.

19 Q. So it's your testimony then that meth, in your
20 experience, methamphetamine is either pound or ounce?

21 A. In my experience, yes. In the cases that I worked in
22 Philadelphia and am currently working, that's my experience.

23 Q. And in this particular conversation between these two
24 individuals, there was no -- you're not aware of any
25 surveillance on the sales end where you see someone, you know,

1 go to -- or law enforcement saw someone go and pick up, you
2 know, an amount of drugs and then deliver it in a controlled
3 delivery manner to a confidential informant or an observed
4 transaction, right? That didn't happen here?

5 A. My participation was to review these text messages
6 and make an opinion on what I think the coded language was. I
7 did not participate in any surveillances.

8 Q. No one got arrested at the end of, you know, some
9 transaction here and no amount was recovered, right?

10 A. Well, I think these phones were recovered anecdotally
11 to all these events.

12 Q. I'm just talking about, you know, drug delivery. We
13 don't have a drug delivery that was recovered as a result of
14 this text message and this investigation, right?

15 A. Not that I'm aware of.

16 Q. Okay. You would agree with me that that would
17 certainly be very instructive, very valuable in determining
18 what an ice joint is. You know, if you hear or you see in a
19 text message, you know, over here, I want an ice joint, and
20 then a transaction takes place, and then, after the
21 transaction, you arrest someone and they have a pound, then we
22 know for sure that one of those ice joints is a pound, right?

23 A. Absolutely. That would be a tactic you could take if
24 you were listening to this live. It's my understanding that
25 these phones were recovered during some sort of search warrant

1 or interaction with the defendant, and these phones were looked
2 at. These text messages were retrieved probably months later,
3 you know, not contemporaneously to the activity that was going
4 on.

5 Q. Fair enough. But had it been in real time and had
6 this been actually done in concert with a controlled delivery,
7 it could very easily have been -- an ice joint could have been
8 an ounce. If someone got arrested with an ounce after having
9 this conversation --

10 MR. STENGEL: Objection, Your Honor.

11 THE COURT: Do you want to show the witness a
12 document?

13 MR. HUGHES: No, Your Honor.

14 THE COURT: Stay at the podium. What's the question?

15 MR. HUGHES: Sorry. I'll rephrase.

16 BY MR. HUGHES:

17 Q. So if we had a conversation -- this is a
18 hypothetical. If we had a situation in which this conversation
19 took place where there's a phone call, text message, let me get
20 one of those ice joints --

21 THE COURT: Stay at the podium. This is not an
22 argument to the jury. Please stay at the podium and ask the
23 question.

24 MR. HUGHES: Yes, Your Honor.

25 BY MR. HUGHES:

1 Q. I'm sorry. I'll go through this again. We have a
2 text communication over here where someone is asking for one of
3 those ice joints. Then later someone is then, after a
4 transaction takes place, two people get together. Money and
5 drugs are exchanged. And then afterwards, the person who
6 receives the drugs is arrested with an ounce of
7 methamphetamine. That would certainly change your opinion as
8 to what an ice joint is, right?

9 THE COURT: Well, do you understand this
10 hypothetical?

11 THE WITNESS: I understand the hypothetical, Your
12 Honor.

13 THE COURT: Okay. Does this relate to your direct
14 testimony?

15 THE WITNESS: My interpretation is that an ice joint
16 and a whole one is a pound of methamphetamine.

17 BY MR. HUGHES:

18 Q. I understand that, but I'm offering you a
19 hypothetical situation.

20 THE COURT: This is beyond the scope of direct. It's
21 really not cross-examination because he did not rely on any
22 facts similar to your hypothetical. Ask another question.
23 That hypothetical does not relate to his direct testimony as an
24 expert.

25 MR. HUGHES: Yes, Your Honor.

1 BY MR. HUGHES:

2 Q. Special Agent Updegraff, in this slide, and I believe
3 you noticed that there are some inconsistencies, it says Jameel
4 Hickson and then a phone number of 5474. I'm sure my
5 co-counsel will bring this up, but in this slide it indicates
6 that that's his number and then it says "texts Jamaal Blanding"
7 at a number ending in 4737. Do you see that?

8 A. Yes.

9 Q. But then over on the left margin of these messages,
10 we have the number 5474 texting someone named Mizzo. So you
11 are aware that at no time in this investigation law enforcement
12 has ever determined that anyone referred to my client as Mizzo,
13 right?

14 A. I am not aware of that.

15 Q. Okay. If 5474 is neither my client's number or
16 Mr. Hickson's number and my client isn't named Mizzo, you would
17 agree with me that perhaps this is not appropriately
18 attributing a pound of methamphetamine to Mr. Blanding, right?

19 A. I can't make the determination of who Mizzo is.

20 Q. Well, Special Agent, you're telling us that you're
21 interpreting the data that's given to you, and that's the
22 foundation of your opinion, right?

23 A. Correct. I was given the information that this was a
24 conversation between Jamaal Blanding and Jameel Hickson, and
25 this was the substance of the conversation.

1 Q. Fair enough. But if the phone number isn't Jameel
2 Hickson's and my client isn't Mizzo, then there's no argument
3 as to the conclusion being flawed here, right?

4 A. Correct.

5 MR. STENGEL: Objection, Your Honor.

6 BY MR. HUGHES:

7 Q. It's the data is what -- your opinion is based on
8 data. We're not arguing about data.

9 THE COURT: You can answer that. Your opinion is
10 based on data that was given to you, right?

11 THE WITNESS: Yes, sir.

12 THE COURT: Next question.

13 BY MR. HUGHES:

14 Q. So if the data is wrong, it's not your fault, right?

15 A. I'm not blaming anybody, but I made an opinion on the
16 two numbers and the conversation.

17 THE COURT: You don't have any knowledge as to
18 whether the underlying data is correct or incorrect; is that
19 correct?

20 THE WITNESS: That's correct, Your Honor.

21 THE COURT: Next question.

22 BY MR. HUGHES:

23 Q. Now, while I fumble for these slides, Special Agent,
24 there are times in here where transactions are attributed to
25 Mr. Blanding for crack-cocaine sales rather than powder cocaine

1 sales. Generally speaking, why did you make a determination of
2 hard versus soft?

3 A. Could you show me a reference, please?

4 Q. Yes. That's what I was looking for.

5 MR. HUGHES: January 4, 2018, please.

6 BY MR. HUGHES:

7 Q. This is actually an allegation that Mr. Blanding is
8 ordering cocaine -- crack-cocaine from Mr. West. Do you have
9 that slide in front of you?

10 A. I do.

11 Q. I heard your interpretation of Maybach. That's 62
12 because there was a model 62 Maybach?

13 A. Yes.

14 Q. I haven't heard that one before, but I get you.
15 62 grams, though. 62 is 62 grams. Why 62 grams of crack? We
16 don't know what substance was factually traded here, do we?

17 A. Can we go to the next page, please?

18 Q. Yep. If you're only looking at the data, how do we
19 get to crack as opposed to soft? Or is the slide in error and
20 it could be either hard or soft?

21 A. I don't see a clear delineation to make it crack on
22 this. This could be an either/or in my estimation based on --
23 I don't have a clear recollection of how I made this
24 determination at this time.

25 Q. Thank you. And then lastly, on slide -- it's

1 January 6, 2018. Now, this is purported to be a notation in
2 Mr. Blanding's phone. The date, we believe, or based on
3 electronic -- based on the cell phone dump, that's the date
4 attributed to this message, but as we sit here, we don't know
5 if these are historical numbers that are from months previous,
6 correct? You can't tell if this is a record of something that
7 happened before or something that's planned to occur in the
8 future or something that's owed or something that has been
9 profited?

10 A. This notation, I would consider this a tally sheet
11 that someone had in their phone. It's been my experience that
12 individuals that traffic in narcotics kind of keep track of who
13 owes them money and what they have on hand. And my
14 interpretation of this was that Mr. Blanding had the \$14,000 at
15 his house, 5 pounds of meth, and those were other notations
16 where the people owed him money.

17 Q. Well, all right. Let's go through it. So if he has
18 \$14,000 at the crib, at his house, would the fact that \$14,000
19 was never recovered from his house affect your opinion?

20 A. I do not know where his house is.

21 MR. STENGEL: Objection, Your Honor.

22 BY MR. HUGHES:

23 Q. It's not in evidence. Now, I see the 5 pounds ice,
24 and I understand what your opinion is about ice. Then it says
25 1,400 D block. We don't know what D block is, right?

1 A. My interpretation of that would be an individual that
2 owed him money or he owed money. Hard to tell from this.

3 Q. That's a lower case D, you know. It's not like a
4 capital D as in a person. Does that factor into your
5 interpretation?

6 A. No. No. I mean --

7 Q. 1,400 could be he needs to spend 1,400 for something
8 called D block?

9 A. Sure.

10 Q. It could be a club. You've never seen D block before
11 used in drug conversation, right?

12 A. No. I'm assuming it's an individual, but I have no
13 independent knowledge of that.

14 Q. But without independent knowledge, it could be
15 something not drug related because you know crib is a house,
16 right?

17 A. Correct.

18 Q. And then we have three numbers. We have 5,400,
19 5,400, 4,000, and there's no names next to 5,400, 5,400.

20 A. Well, my interpretation would be that Eric owed him a
21 lot of money, that he made three sales to Eric, and he owed him
22 for three increments of ice. That would be my interpretation
23 of that.

24 Q. But you have no other information -- sorry. Strike
25 that. It could have something to do with D block, no?

1 A. Possible.

2 MR. HUGHES: I have no further questions. Thank you.

3 THE COURT: Mr. Ortiz.

4 - - -

5 CROSS-EXAMINATION

6 - - -

7 BY MR. ORTIZ:

8 Q. Good morning.

9 A. Good morning, Counsel.

10 Q. Blast from my past. How are you doing?

11 A. Good, sir.

12 Q. We also have worked on cases, correct, sir?

13 A. Yes, sir.

14 Q. Listen, I am in a state of somewhat disbelief, but
15 I'm going to do this and I'm going to walk through what you
16 were asked to do in this case. So I want to start with the
17 beginning of your testimony.

18 We started with your expertise, and undoubtedly
19 you're an expert, correct? You've done a lot of work on the
20 street, correct?

21 A. Yes.

22 Q. Proffers with people who were cooperating, correct?

23 A. Correct.

24 Q. And you have a lot of experience, and I appreciate
25 that, from actual ground-level activity as well as the

1 larger-scale picture when it comes to drugs, correct?

2 A. Yes.

3 Q. So you've actually engaged in hand-to-hand
4 transactions and stuff of that nature, correct?

5 A. I have.

6 Q. And I notice you mentioned, in particular, cocaine,
7 correct?

8 A. I have purchased cocaine, crack-cocaine, and heroin.

9 Q. And I noticed you did not say meth, correct?

10 A. I have not purchased meth in an undercover capacity.
11 I've utilized confidential sources to purchase ounce and pound
12 quantities of methamphetamine.

13 Q. Understood. Now, we began with the sources of drugs,
14 okay, and I noticed that the Government would only mention
15 California. But then you indicated that source locations also
16 include Texas and Mexico, correct?

17 A. A source location would be, for methamphetamine,
18 would be Mexico, and for cocaine would be South America, most
19 notably Colombia. Where it ingresses into the US is any of the
20 southwest border states, California, New Mexico, Arizona,
21 Texas.

22 Q. I left out Arizona.

23 So someone traveling across the country or for
24 whatever reason could go to any one of those states to purchase
25 any one of those narcotics, correct?

1 A. If they had the connection there, yes, they could.

2 Q. Right. If they have the connect, they can go there.
3 You know, you may not be aware of it, but they made the call,
4 and they go to whatever location in Arizona, whatever stash
5 house, or whatever the case may be, and they could pick up
6 drugs in Arizona, for example?

7 A. Yes.

8 Q. Or Texas or New Mexico and California, correct?

9 A. Yes.

10 Q. Now, you indicated that -- we talked a lot about the
11 way that, for example, cocaine is sold in terms of weights,
12 correct, and meth? You gave the weights sold, correct?

13 A. Yes.

14 Q. Now, how marijuana is sold, we didn't talk about
15 that. That is sold usually -- how does that usually come
16 across the country? Does it come in pounds? Does it come in
17 ounces? How does that work?

18 A. Marijuana usually ingresses through the same
19 transportation routes as the methamphetamine, the cocaine, the
20 heroin, the fentanyl. It comes in bale quantities, maybe
21 25-pound to 40-pound bales. Once it reaches the source states,
22 it's oftentimes broken down into pound quantities and then
23 shipped. Or it could be even shipped -- I've seen it shipped
24 here in 40-pound bales in tractor trailers.

25 Q. Right. So you could bring a very large bag, trash

SPECIAL AGENT UPDEGRAFF - CROSS

1 bag, or bale of marijuana from the source in any one of those
2 three states to Philadelphia, correct?

3 A. Yes.

4 Q. And then the person who purchased that large bag
5 would then need to, if they were going to sell it -- because
6 they're not selling it usually in 45 pounds, correct?

7 A. Not typically but --

8 Q. You could flip it but you know --

9 A. The profit margin comes in when you break it down and
10 resell it.

11 Q. Right. So that was my point. After all that work,
12 to make a good profit, you want to break it down at least in
13 pounds, half pounds, correct?

14 A. Yes.

15 Q. And you indicated that a whole, for example, your
16 interpretation is a pound, correct?

17 A. My interpretation, a whole one in this -- in the
18 specific instance here of the ice joint, was an interpretation
19 of a pound, yes.

20 Q. If I wanted a whole pound of weed, wouldn't I say I
21 want a whole? Weed is commonly sold in pounds.

22 A. Yes, or --

23 Q. Or some other term.

24 A. It depends on the level of the violators. When
25 person A is talking to person B, a whole one might mean an

1 ounce. When person B is talking to person C, a whole one might
2 mean a 125. When person D is talking to person F, a whole one
3 might mean a kilogram. So it's contextual on the people who
4 are speaking back and forth to each other.

5 Q. So it could be even smaller amounts, correct,
6 depending on what the group uses for code?

7 A. Theoretically, yes.

8 Q. I didn't say that. You just gave the example.

9 A. Yes.

10 Q. Theoretically, it could be lesser amounts when I ask
11 for a whole one?

12 A. Yes.

13 Q. Okay. Great. So at any rate, I noticed you said, we
14 talked about it, I took notes, you can flip it, which obviously
15 that doesn't create the high-profit margin. So normally you
16 want to break it down, correct? And if you break it down, you
17 would need a heat sealer, correct? To package it up, if it's
18 marijuana or another drug, you usually package it up in some
19 way?

20 A. You can utilize a heat-sealer or just as simplistic
21 as zip-lock baggies.

22 Q. Right. You could use zip-lock baggies. If you were
23 selling it in pounds, you could use zip-lock, but you could
24 also zip-lock it, correct?

25 A. (No response.)

1 Q. You could use smaller bags or you could use larger
2 bags in order to bag the marijuana, correct?

3 A. Yes.

4 Q. If you were zip-locking it, then you would have a
5 machine -- I mean, if you were heat-sealing it, you would want
6 something to be able to do that nearby, correct?

7 A. Yes.

8 Q. Now, are you familiar with various types and names of
9 marijuana?

10 A. I am familiar with numerous names. I know there's
11 probably 150, 200 names of marijuana.

12 Q. My personal opinion would be 150 to about 200,
13 anywhere in that number, correct?

14 A. That seems to be accurate.

15 Q. Some people do buy organic marijuana, correct? OG,
16 have you seen that term?

17 A. No.

18 Q. Have you seen, for example, do you know what ice weed
19 is?

20 A. No.

21 Q. Are you familiar with the terms, the various
22 varietals, or is that just something you're not an expert in?

23 A. I'm familiar with numerous terms of marijuana, but
24 not all 200.

25 Q. Fair enough. Are you aware there's organic weed?

1 A. Yes, I'm aware there's weed that's -- we focus on --
2 there's two different types of weed, in general. Like, weed
3 that's hydroponically grown in the continental United States
4 and that's grown without -- you know, grown in a controlled
5 environment that produces a higher level of THC. Then there's
6 weed that comes from Mexico, which is usually cheaper and less
7 THC content because it's grown out in the environment. Yeah,
8 the higher-level more exotic weed has cool names, I guess.

9 Q. Right. That's basically what I'm saying. And the
10 cheaper kind of weed, have you ever seen it pressed into
11 bricks, the cheap weed?

12 A. Absolutely. It comes out of that bale. It's
13 literally a bale, like a hay bale, if anybody's a farmer. It's
14 literally a bale, and it's sectioned just like a hay bale is
15 sectioned when it's compressed. And when individuals break it
16 down, it easily falls apart into sections.

17 Q. So those bricks easily break down, and then they get
18 packaged up for resale once they arrive at the location that
19 they're meant to go to for sale, correct?

20 A. That's fair.

21 Q. Now, I've gone through these texts, and I haven't
22 seen any of them identified -- I've only seen one of them
23 identified as purportedly being for my client. The names on
24 these documents were given to you, what, by the Government?

25 A. By the investigative team, correct.

1 Q. Well, first off, you're familiar with the term "OG"
2 in terms of referring to somebody, correct?

3 A. Yes.

4 Q. Original gangster, correct?

5 A. Right.

6 Q. That's a common nickname on the street, correct?

7 A. It's a nickname on the street for usually an older
8 gentleman, an original gangster.

9 Q. For an older guy. OG, it's common in Philadelphia.
10 I've heard it many times myself. You would agree it's a common
11 way to refer to an older person?

12 A. Yes.

13 Q. But the one text that's identified here --

14 MR. ORTIZ: I ask that you put up 3001.

15 BY MR. ORTIZ:

16 Q. This is what was provided to me. Can you see that?

17 A. I can.

18 Q. I'm going to go through the numbers for Jameel
19 Hickson. I see -- do you see a (215)620-9799? Do you see
20 that?

21 A. Yes.

22 Q. (646)877-2762, do you see that?

23 A. Yes.

24 Q. And it goes down the line, and it ends right before
25 this gentleman, Dennis Harmon, correct?

1 A. Yes.

2 Q. I see 8500, though, three times, correct?

3 A. I see that.

4 Q. Are you aware that those are the phones that are
5 identified in this case related to the individuals in this
6 document?

7 A. I am not. I haven't seen this exhibit before.

8 Q. Well, you indicated that phones were seized from
9 people and probably months after the fact, and then the phone
10 numbers were identified, correct?

11 A. Yes. That's my supposition on the investigation.

12 MR. ORTIZ: Could you put up exhibit -- the ice
13 joint? Is there any way to put up both exhibits?

14 THE TECHNICAL ASSISTANT: Yes. Just one second.

15 BY MR. ORTIZ:

16 Q. This is what's been admitted into evidence so far. I
17 want you to look at the first exhibit on the left side of the
18 screen. Do you see the name Jameel Hickson?

19 A. Yes.

20 Q. (215) 720-5474, do you see that?

21 A. Yes.

22 Q. All right. Do you see that number -- let's see how
23 many phones I have here. I have, looks like eight phones. Do
24 you see that number there?

25 A. No.

SPECIAL AGENT UPDEGRAFF - CROSS

1 Q. Now, I do see Jamaal Blanding on the right-hand side.
2 Do you see that? And if you go to 707, I do see, I believe,
3 that number, 4737.

4 A. Yes.

5 Q. All right. And you're sitting here telling us that
6 Mr. Hickson sent this text based on this exhibit?

7 A. I am sitting here making an evaluation on the context
8 of the text. I am not delineating who made what text to who.
9 I am solely going by the information provided to me on this
10 slide.

11 Q. All right. This is what we are -- this is the --
12 this is what's before the jury right now. That exhibit on the
13 left is what's before the jury. You are telling them that
14 Jameel Hickson -- first of all, I don't agree this is ice, but
15 we're moving past that. You're telling them right now that
16 this is Jameel Hickson, that this is Jameel Hickson.

17 A. I have.

18 Q. With the number that's 5474?

19 A. That's correct.

20 Q. But it's identified it looks like Mizzo, Mizzo 2,
21 correct?

22 A. I see that.

23 Q. And Mizzo 2 is reading I need one of them ice joints.
24 So that person is, I guess, receiving the text. So that, I
25 guess, would be Mr. Blanding with that number.

1 A. Yeah. An incoming text to Mr. Blanding is how I
2 interpreted that.

3 Q. Making all of the assumptions that we're being asked
4 to make with this crucial exhibit, I guess Mr. Blanding would
5 be 5474, not the 574737 up in the corner. Because remember,
6 this is coming from Jameel Hickson, right?

7 THE COURT: That's multiple questions.

8 BY MR. ORTIZ:

9 Q. Well, this text would be going allegedly to,
10 according to your exhibit, to Mr. Blanding, correct?

11 MR. STENGEL: Objection, Your Honor.

12 THE COURT: Well, can you answer? Can you tell?

13 THE WITNESS: I cannot tell.

14 BY MR. ORTIZ:

15 Q. This exhibit gives no price, correct?

16 A. Correct.

17 Q. And we talked about that "whole" has different,
18 depending on the group, can be different amounts, correct,
19 their code language?

20 A. Yes. My interpretation of this was informed by the
21 previous text with Mr. Blanding referring to a zip as an ounce,
22 and the query of a whole one led me to believe that it was a
23 larger quantity.

24 Q. But this doesn't use the word "zip" in this text.

25 A. That's my point exactly.

1 Q. Well, it just says whole one.

2 A. Right.

3 Q. And there's no price?

4 A. Correct.

5 Q. And to the best of your knowledge, no one was
6 arrested purchasing whatever this ice joint was, correct?

7 A. To my knowledge, that's correct.

8 Q. By the way, joint is also a term used for marijuana
9 smokers, correct?

10 A. Yeah. Joint is used by marijuana smokers, but it's a
11 common vernacular just like jawn, joint, jawn.

12 Q. This isn't jawn. This is joint, right? That's what
13 it says?

14 A. This says joint, yeah.

15 MR. ORTIZ: I have no further questions of this
16 witness.

17 THE COURT: Mr. Goldman.

18 MR. GOLDMAN: Thank you, Your Honor.

19 - - -

20 CROSS-EXAMINATION

21 - - -

22 BY MR. GOLDMAN:

23 Q. Hello, Agent.

24 A. Good morning, Counselor.

25 Q. I'm OG Goldman. I represent Mr. Gadson.

1 Let me get back to where I was. The field that
2 you're involved with, you'd agree with me, is very subjective,
3 is it not?

4 A. I don't think the laws that I enforce are subjective.

5 Q. No, it's not the laws that you -- let's talk about
6 interpreting words. It's subjective, is it not?

7 A. My interpretation of coded language, yes. But my
8 experience and my dealing with the violators is how I learned
9 them, and that's definitely subjective.

10 Q. For example, less subjective and perhaps objective is
11 police officer seized white powder, give it to a chemist, the
12 chemist sticks it in a machine, does the test, pops it out,
13 it's cocaine. That's an objective test, correct?

14 A. Yes, sir.

15 Q. So there's more room for error on subjective analysis
16 as opposed to objective analysis, is there not?

17 A. Yeah. I would say my interpretation of these text
18 messages are not, you know, done to a scientific degree of
19 certainty, for sure.

20 Q. Right. And you're certainly aware, you've been doing
21 this for a long time and some of us have been doing it for a
22 long time, that there's been occasions when people with your
23 qualifications say what words mean, and then they later find
24 out they were wrong; it's not even drugs that they were talking
25 about. You're aware of those instances, are you not?

1 A. I'm not specifically aware of those instances, but I
2 can see how that possibility could exist.

3 Q. Have you heard about the case, you know, since you're
4 an expert, where someone testified, an expert testified that
5 barbecue was cocaine and then the person --

6 MR. STENGEL: Objection, Your Honor.

7 BY MR. GOLDMAN:

8 Q. -- the person came in and testified and showed it was
9 beef barbecue?

10 THE COURT: No, no, no. That's not appropriate.

11 MR. GOLDMAN: He's an expert, Your Honor.

12 THE COURT: No. Next question.

13 BY MR. GOLDMAN:

14 Q. Being subjective, another reason it's subjective is
15 you don't come in, grab the text, they lock you in a room and
16 ask you your opinion, and then you render an opinion --

17 THE COURT: Mr. Goldman, that has nothing to do with
18 his direct. Nobody looked him in a room, okay? That is --
19 please, that will be stricken, ladies and gentlemen of the
20 jury.

21 BY MR. GOLDMAN:

22 Q. In this case, you're not simply given the text
23 messages that you've interpreted and asked you to sit down and,
24 based upon your past expertise, render an opinion on what these
25 words mean, correct?

1 A. I was given the materials, including the indictment
2 and other volumes of material to review. I reviewed them and
3 then I met with the investigative team and we went over them,
4 yes.

5 Q. So the one thing you're looking at is the indictment,
6 and the indictment is saying that there's heroin --

7 THE COURT: Well, wait a minute. Did you ever look
8 at the indictment?

9 MR. GOLDMAN: He just said he did, Your Honor.

10 THE WITNESS: Yes, Your Honor, I did review the
11 indictment.

12 THE COURT: I didn't realize that. Go ahead.

13 BY MR. GOLDMAN:

14 Q. So before you start your analysis, the indictment
15 says to you that it's heroin, it's methamphetamine, it's
16 crack-cocaine, and it's cocaine, correct?

17 A. Yes.

18 Q. Okay. And then after looking at that and looking at
19 the allegations by the Government in this case, you then sit
20 down who with the agents?

21 A. With the investigative team.

22 Q. So then the investigative team, on top of what the
23 indictment tells you, now tells you what they think that this
24 case is about, correct?

25 A. They ask me questions on my opinion of -- they got me

1 to look at these text messages and opine on what the words
2 meant.

3 Q. They first tell you things about what they believe is
4 involved in this case, correct?

5 A. I reviewed the indictment, and then I opined on what
6 I thought some of these words meant.

7 Q. What's the purpose -- I don't understand. What's the
8 purpose of sitting down with -- is it these two agents you sat
9 down with?

10 A. I have on occasion, and the attorneys.

11 Q. Right. So let's just do it in the beginning. When
12 you sit down with the agents, if you're not receiving
13 information from them other than what's in the indictment,
14 what's the purpose of sitting down with the agents?

15 A. They're receiving information from me.

16 Q. Okay. So it's not a two-way street?

17 A. Oh, of course.

18 Q. So what are they telling you?

19 A. They're telling me the scope of the investigation.
20 They're telling me what this organization -- you know, outside
21 of my testimony here, which is on primarily on the coded
22 language on the text messaging, they were telling me the scope
23 of the organization, the trips that they made, things to that
24 effect.

25 Q. We all recognize your expertise, but you're aware

1 that there's a factor of human bias. Do you understand that?

2 A. I'm not understanding that question.

3 Q. Yes. That you can either consciously or
4 subconsciously form an opinion of something by information you
5 receive, for example, from fellow agents?

6 MR. STENGEL: Objection, Your Honor.

7 THE COURT: Did you personally detect any human bias
8 in your work here yourself or with the agents?

9 THE WITNESS: No, Your Honor.

10 BY MR. GOLDMAN:

11 Q. Well, there's conscious and subconscious bias.

12 THE COURT: Do you object to that?

13 MR. STENGEL: Objection, Your Honor.

14 THE COURT: Sustained.

15 BY MR. GOLDMAN:

16 Q. Help me out on this.

17 THE COURT: No. You can ask him what he did, all
18 right, and you can bring out things that he didn't do. But he
19 didn't testify about conscious or subconscious. Okay. It's a
20 confusing question. Next question.

21 MR. GOLDMAN: I'll try to be less confusing.

22 BY MR. GOLDMAN:

23 Q. What's the purpose, if you're giving a clear opinion,
24 of listening to fellow Government agents tell you what they
25 believe is involved in this case before you do your analysis?

1 THE COURT: I'm going to rephrase your question.

2 You talked to the agents, as you testified to; is
3 that correct?

4 THE WITNESS: That's correct, Your Honor.

5 THE COURT: And it was a give and take. They told
6 you information. You asked them questions; is that right?

7 THE WITNESS: Yeah, absolutely.

8 THE COURT: Now, what's the question?

9 BY MR. GOLDMAN:

10 Q. And what did they tell you about who did what before
11 you rendered your analysis?

12 THE COURT: He's testified to that. Ask him specific
13 questions about his direct or what your colleagues asked on
14 cross. He's not going to go over from beginning to end to
15 answer that question.

16 MR. GOLDMAN: Your Honor, I want to know what the
17 agents told --

18 THE COURT: Ask a different question. That question
19 is way too broad. It would require him to testify for another
20 hour and a half, and I'm not going to do that.

21 BY MR. GOLDMAN:

22 Q. Would it take you an hour and a half to summarize?

23 THE COURT: He testified on direct for over an hour
24 and a half. You were here and you listened to it.

25 MR. GOLDMAN: This wasn't covered, Your Honor.

1 THE COURT: Ask him specific questions about what he
2 testified to or what the scope of his work was.

3 BY MR. GOLDMAN:

4 Q. Agent, we're now for the first time --

5 THE COURT: He's not here to repeat everything he
6 said on direct.

7 MR. GOLDMAN: This is not repetitious. It wasn't
8 covered by anyone, Your Honor.

9 THE COURT: Next question, please.

10 MR. GOLDMAN: Yes.

11 BY MR. GOLDMAN:

12 Q. Let me ask you this. To summarize what they told
13 you, how long would it take you to tell me?

14 THE COURT: No, you don't have to answer that.

15 BY MR. GOLDMAN:

16 Q. Did they tell you what drugs they believed were
17 involved in this case?

18 A. I reviewed the indictment.

19 Q. Did they tell you which defendants they believed to
20 be doing what?

21 A. No.

22 Q. How many times did you meet with the agents?

23 A. I would say five or six times with a combination of
24 the trial team and the agents.

25 Q. How many times before you rendered the opinion that

1 you're giving us today did you meet with these agents or
2 prosecutors?

3 A. The same amount, five or six.

4 Q. And how long were these meetings?

5 A. Some were two hours. Some were four, five hours.

6 Q. These were not recorded in any way?

7 A. No.

8 Q. So before you rendered your opinion, you had roughly
9 30 hours of communications with prosecutors and agents before
10 you rendered your opinion?

11 A. I am sure that I spent probably twice that reviewing
12 the materials to ensure I was making an accurate assessment.

13 Q. I'm not quarreling with the amount of time you spent
14 on the case, but please answer my question. You spent, before
15 you rendered an opinion, some 30 hours, roughly, with the
16 agents and the prosecutors before you rendered an opinion,
17 correct?

18 A. My opinion was kind of rendered as it evolved as I
19 reviewed the material.

20 Q. I asked you two questions ago how many times and how
21 long were those meetings before you rendered the opinion, and
22 you indicated it was five to six meetings, and the meetings
23 were four or five hours.

24 A. I think I misunderstood your question, Counselor, to
25 where I'm rendering an opinion now on the record, I rendered an

1 opinion to the investigative team as we evolved during the
2 course of our meetings.

3 Q. The final opinion as far as who did what, as far as
4 what drugs, and as far as what quantity of drugs, in fact, what
5 you testified to today, how many meetings before you came to
6 the final conclusion?

7 A. The five or six, Counselor.

8 Q. Thirty hours or so, correct?

9 A. I think my opinion probably evolved over during that
10 time frame.

11 Q. I'm sure it did. Let me ask you something that
12 hasn't really been discussed. Well, it's been discussed
13 somewhat but the -- there's a variety of prices for marijuana,
14 is there not?

15 A. Yeah. It's like any other drug commodity, prices on
16 the quality and the quantity.

17 Q. All right. What's the range of prices for a pound of
18 marijuana?

19 A. Pound of marijuana would be approximately -- where
20 are you talking, Counselor, here in Philadelphia or a source
21 state?

22 Q. Yeah, sure?

23 A. Philadelphia, between 800 and \$1,000 for Mexican
24 marijuana. Maybe as high as 2,500 or higher for exotic or
25 hydroponically grown marijuana.

1 Q. How about Willie Nelson quality? Do you have the
2 answer to that?

3 A. I do not know that answer.

4 Q. So it ranges anywhere from 800 to 1,000 at the low
5 end, and that could be pretty lousy stuff, stem, seeds, you
6 know, dog food?

7 A. No. Dish weed.

8 Q. Whatever you call it, whatever anybody else calls it.

9 But the exotic will go up to 2,500 for a pound?

10 A. I would say at least, maybe higher.

11 Q. And just to move this along, as far as drug
12 quantities, when you were doing the quantities, on some you
13 fast tracked and you said it's similar to the cocaine as far as
14 how it's broken down. So basically the same analysis that you
15 gave on cocaine and also with marijuana, for example, pound,
16 half pound, quarter pound, ounce, you know, half an ounce, et
17 cetera, right? It's pretty much the same basic?

18 A. Marijuana follows along that, what the counselor just
19 said, on that price, but the terminology is different. I
20 didn't see any terminology relating to marijuana in my
21 assessment of these text messages.

22 Q. Are you aware that DEA recognizes the term "zip" as
23 being a possible slang for marijuana or meth or cocaine?

24 A. I do. But I think I testified, in relation to zip
25 here, I determined that, in my opinion, was a quantity, not a

1 form.

2 Q. But your agency has put out a publication during the
3 time period of this, and your agency is broader than just the
4 Philadelphia area, correct?

5 A. Yes. We're worldwide.

6 Q. Worldwide. And they put out this broadcast to law
7 enforcement that says that zip can be marijuana or it could be
8 cocaine or it could be methamphetamine, correct?

9 A. Yes.

10 Q. You're not quarreling with your agency on that, are
11 you?

12 A. No.

13 Q. Because you're still working there, right?

14 A. Correct.

15 Q. Do you know the locations where large quantities of
16 marijuana were found during this investigation?

17 A. I do not.

18 Q. Do you know who was selling marijuana for the
19 organization?

20 A. I do not.

21 Q. Do you know the prices that the organization was
22 selling the marijuana for?

23 A. I do not.

24 Q. Do you know what pricing was for the marijuana that
25 they were getting for a pound, half pound, quarter pound, et

1 cetera, downwards?

2 A. No.

3 Q. When we're talking about code, code is always kind of
4 moving on, isn't it?

5 A. Oh, absolutely.

6 Q. For example, when you and I were younger, the
7 buzzwords for a lot of drugs were, you know, bring me a tire or
8 bring me a car?

9 A. That must be going back before my time.

10 Q. I am what I am.

11 Okay. So my point then is, at some time people were
12 using, if you accept my representation, when I was a young
13 prosecutor, cars and trucks and tires might have been used, if
14 you accept my representation. And then the people who are
15 involved with drugs go, whoa, law enforcement caught on to that
16 one, let's evolve, let's develop, correct?

17 A. You see that. There's some certain code words that
18 are constant that seem to have stood the test of time. There
19 are other ones that are unique to certain geographic regions.
20 There are ones that are unique to even specific trafficking
21 groups that utilize a specific code that is known to them.

22 Q. Right. And that's the point I want to get to. It's
23 known to them. So an organization, in order to stay a step
24 ahead of law enforcement, can develop their own codes that
25 don't match the code words which you've seen before, correct?

1 A. Correct. There's a couple instances here that I
2 haven't seen before, cereal box, and it's up to the
3 investigator to decipher it.

4 Q. Right. And when you get a first go around, you've
5 never seen cereal box before, this is the first time you've
6 ever made that interpretation, you agree with me, as a human
7 being, you could be wrong on what a cereal box is?

8 A. I do agree with that, but it could be an evolving
9 word within the trafficking group too. It could be pizza next
10 week or it could be, like, it could be back to car.

11 Q. For example, cereal box, organic cereal box, organic
12 weed. Oh, that's a good one. It could develop like that as
13 far as a code word goes, correct?

14 A. I didn't see that representation here due to the
15 pricing.

16 Q. But an organization could do that, could they not?
17 To come up with a term that law enforcement's not aware of to
18 apply it to something else that you don't know about, correct?

19 A. Yes.

20 Q. And if you have an organization where the
21 Government's alleging that heroin was dealt, cocaine was dealt,
22 crack-cocaine was dealt, and meth was dealt, it would not be
23 abnormal that certain individuals, as you go down the feed
24 chain, that they're only involved in this drug or that drug or
25 another drug and not all the drugs, correct?

1 A. What you typically see in the hierarchy of an
2 organization is that there are individuals responsible for
3 certain aspects of the drug distribution, whether stashing it,
4 distributing, picking it up. In a poly-drug, which is a
5 multi-drug organization, typically it's all done by the same
6 crew.

7 Q. Now, you used the word "typically." Typically does
8 not mean, in the English language, that's always case, correct?

9 A. Correct.

10 Q. So in a case where someone just, you know, might be
11 soft, doesn't want to be involved in, you know, the more
12 serious drugs, it's not out of the realm that that individual
13 could say I'm only dealing with this?

14 THE COURT: That's argumentative. Next question.

15 BY MR. GOLDMAN:

16 Q. Okay. What I'd like to do now is to take a look at
17 some of the text messages that you testified to in regards to
18 my client. I'm not going to go through all of them. I'm just
19 going to use a couple as examples.

20 By the way, from your discussions with the agents,
21 from your review of the indictment, from your review of all the
22 material, is it your belief that the people that were involved
23 in this organization were involved with lots of money at any
24 given time dealing with the drugs that they dealt with?

25 THE COURT: That's beyond the scope. He never said

1 anything about people having money.

2 MR. GOLDMAN: Yes, he did, Your Honor. He testified
3 to the money in this.

4 THE COURT: You said you were going to go to specific
5 instances with your client. Please proceed with that.

6 MR. GOLDMAN: I was just doing that as an interlude,
7 Your Honor.

8 BY MR. GOLDMAN:

9 Q. I want to go to some of the text messages where a
10 text message had a dollar figure and then had the slash and
11 then had a weight, as you called it, like a weight of
12 something?

13 A. Yes.

14 Q. So you testified that the money was, like, cash on
15 hand?

16 A. If you could show me one, specifically.

17 Q. Yeah. There's one, for example, that's Hans Gadson.
18 It's 12/28/2017.

19 A. I see it.

20 Q. Sitting and listening to your testimony, when you
21 saw, like, a dollar figure or a numerical figure, then there's
22 a slash, the way I heard your testimony was that the one dealt
23 with the money that he has and the other dealt with the weight
24 that he has?

25 A. Yes. That would be my opinion, that the 1,250 was

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1 the money when he's reporting a count to Mr. West, that he has
2 1,250 on hand from narcotics proceeds, and he has 26 grams of
3 crack-cocaine available still for sale.

4 Q. So on this occasion in December, the amount that
5 Gadson is saying that he has in hand from drug dealing,
6 according to you, is only \$1,250?

7 A. Yes. There was an earlier text between Mr. West and
8 Mr. Gadson when they were discussing the count and they were
9 discussing if Mr. Gadson had taken out his cut and how much he
10 had already given Mr. West.

11 Q. You don't know what Mr. Gadson's cut was, correct?

12 A. Absolutely don't.

13 Q. I think we have a few more of those. I could save
14 time by not pulling them up on the screen unless you want to
15 see them. Maybe I'll get to it easier if we can kind of --
16 I'll try to go chronologically on these. I'm going to skip a
17 lot not to belabor the point.

18 If individuals are involved with only one aspect of
19 the drug dealing, let's say, for example, one drug as opposed
20 to others, would you agree with me that the count that they're
21 giving deals with that which they're involved with?

22 THE COURT: I thought you were going to ask him about
23 December 28, 2017. Have you completed your questions about
24 that?

25 MR. GOLDMAN: Yes.

1 THE COURT: Well, this question is very general.

2 Do you understand the question?

3 THE WITNESS: No.

4 THE COURT: Rephrase it because I don't understand it
5 either, and it's a very general question. I thought you were
6 going to ask him specific questions about your client. Can you
7 proceed and do that now, please? You've been cross-examining
8 for over a half an hour.

9 MR. GOLDMAN: Judge, that's not a long time,
10 respectfully.

11 THE COURT: You said you were going to ask him about
12 specific transactions involving your client. I'm going to
13 direct you to proceed on that line or you won't be able to do
14 that anymore.

15 MR. GOLDMAN: Judge --

16 THE COURT: I've ruled. Do you want to ask him any
17 questions about specific transactions with your client?

18 MR. GOLDMAN: I do, Your Honor.

19 THE COURT: Proceed and do that right now.

20 MR. GOLDMAN: I need to lay a foundation.

21 THE COURT: No, you don't. Overruled.

22 MR. GOLDMAN: I can't?

23 THE COURT: Ask him direct questions about specific
24 contents of this related to your client, Mr. Gadson.

25 MR. GOLDMAN: Am I limited to just doing that, Your

1 Honor?

2 THE COURT: You have to proceed with that or you're
3 not going to pick it up later. You've laid a lot of
4 foundation. It's up to the jury to determine the credibility
5 of this witness. And he's been testifying on direct and
6 redirect for over three hours with a ten-minute break in
7 between.

8 MR. GOLDMAN: Your Honor, I'm just dealing with one
9 client.

10 THE COURT: Go right ahead and do that.

11 BY MR. GOLDMAN:

12 Q. There is a November 29, 2017 text between West and
13 Gadson and he says: I need a count.

14 This is all that it says, need a count, right? And
15 he says two 62nd Streets, one dot. There's nothing else on
16 that text.

17 THE COURT: Is that a question?

18 MR. GOLDMAN: Yes.

19 BY MR. GOLDMAN:

20 Q. Do you see that?

21 A. Yes.

22 Q. A 62nd Street, what portion of an ounce is that?

23 A. Two and a quarter ounces.

24 Q. Two and a quarter ounces?

25 A. 62.5 grams.

1 Q. So in this one, which has no other identification,
2 and you've testified that a 62nd means a specific quantity, two
3 and a half ounces?

4 A. Yes.

5 Q. From this text, we don't know what drug it is?

6 A. No. My experience is it's quite clear to me that
7 this is 250 grams of crack-cocaine, due to the indication on
8 11/27 about Mr. Gadson reporting that the hardware count was my
9 methodology behind making the determination whether it was
10 crack-cocaine or cocaine. The amounts are clear to me from
11 investigations, previous investigations, and my experience that
12 a 62nd Street is 62.5 grams of cocaine and a dot is 125 grams
13 of cocaine.

14 Q. You're not saying that that quantity, two and a half
15 ounces of a substance, applies only to crack-cocaine as opposed
16 to cocaine or marijuana, are you?

17 A. It absolutely applies to cocaine, but I am not
18 familiar with the terminology where these numbers would be used
19 in reference to marijuana.

20 Q. When you say you're not familiar --

21 A. In my experience, in my 21 years of experience, I
22 have not heard that.

23 THE COURT: Were you asked anything about marijuana
24 by the Government or any other lawyer before now?

25 THE WITNESS: Not by the Government, Your Honor.

1 THE COURT: Next question.

2 BY MR. GOLDMAN:

3 Q. But you're not familiar what the understanding was
4 between my client --

5 THE COURT: Ask him "are you familiar." It's
6 confusing.

7 MR. GOLDMAN: I'm going to use a leading question, if
8 I may.

9 BY MR. GOLDMAN:

10 Q. Isn't it correct that you do not know what the
11 understanding was between my client and Mr. West as far as what
12 drug Mr. Gadson would deal with, correct? You are not aware of
13 what their agreement was, are you?

14 A. I do not have knowledge of their agreement. What I
15 have knowledge of, their interactions, and my determinations
16 were made by the coded language from their interactions to what
17 I surmised that they were doing.

18 Q. If a 62nd Street means, say, two and a half ounces of
19 a controlled substance, you cannot say that Mr. Gadson and
20 Mr. West agreed that --

21 THE COURT: No. That's argumentative. He already
22 said he doesn't know what their agreement was.

23 BY MR. GOLDMAN:

24 Q. So they could have been talking about --

25 THE COURT: That's argumentative too.

1 MR. GOLDMAN: It's also cross-examination, Your
2 Honor.

3 THE COURT: No. You can ask him anything you want
4 that you haven't already asked that relates to Mr. Gadson and
5 this document.

6 BY MR. GOLDMAN:

7 Q. So you're simply basing this upon a conclusion that
8 you reached in regards to a prior conversation, correct?

9 A. Yeah. I'm basing it on their interaction where
10 they're referring to hardware and software, referring to
11 crack-cocaine and cocaine hydrochloride.

12 Q. But then you make a leap when you say --

13 THE COURT: No. You can ask him if he made a leap.
14 He didn't testify he made a leap. You can't assume he made a
15 leap.

16 Did you make any leaps here, as Mr. Goldman was
17 insinuating?

18 THE WITNESS: No leaps, Your Honor. Just based on my
19 experience.

20 THE COURT: Next question.

21 BY MR. GOLDMAN:

22 Q. So initially, when he gave the weight count to
23 Mr. West, you said that it was cocaine simply because he later
24 asked about hard, correct?

25 A. You'd have to be specific. There's many different

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1 interactions between Mr. West and Mr. Gadson dealing with some
2 cocaine, some crack-cocaine, some that I couldn't determine.

3 Q. Right. But in going chronologically, what I heard
4 you say, and let me know if this is correct, that initially
5 when you saw a count, and then West asked a question about
6 hard, you concluded that the count was for soft, correct?

7 A. In one instance, Mr. West asked for the count.

8 Mr. Gadson responds with two numbers. I forget them exactly.
9 But then he says the hardware count is the same. So, yeah,
10 there was a myriad of instances dealing with cocaine and
11 crack-cocaine.

12 Q. Right. And then the next time that there is a count,
13 simply because you did not see in the conversation the word
14 "hard" used, you then interpreted the count must be a count of
15 crack-cocaine because the word "hard" wasn't in a question
16 placed by Mr. West, correct?

17 A. Yes. My methodology was determined from the
18 11/27 text where Mr. Gadson said I'm going to shoot you the
19 count when I make a hardware play.

20 Q. Would you agree with me that what you don't know, for
21 example, just prior to any of these text messaging, you have no
22 idea what Mr. West and Mr. Gadson had already spoken about,
23 correct?

24 A. That's absolutely correct.

25 Q. Right. So, for example, West could have seen Gadson

1 and said --

2 THE COURT: That's argumentative. He says he has no
3 idea. He said this many times. He has no idea what the
4 conversation was between any of the defendants.

5 Is that right?

6 THE WITNESS: Correct, Your Honor.

7 THE COURT: Next question.

8 BY MR. GOLDMAN:

9 Q. You'd agree with me then that simply because the
10 question "hard" is not put in a text, that doesn't preclude the
11 fact that they could have been talking about something
12 different than crack-cocaine?

13 THE COURT: Okay. Mr. Goldman, you're once again
14 loading into the question an assumption that he knows what
15 they've spoken about. He said he has no idea. I'm going to
16 give you five more minutes to complete your cross-examination,
17 and then you're done.

18 MR. GOLDMAN: Respectfully --

19 THE COURT: I understand you disagree.

20 MR. GOLDMAN: I have an objection.

21 THE COURT: That's my ruling. Five minutes.

22 MR. GOLDMAN: I can't do it in five minutes.

23 THE COURT: Take five minutes. Then you'll be done.

24 MR. GOLDMAN: That's fine. I just want to put that
25 on the record, Your Honor.

1 THE COURT: You've asked repetitive questions and
2 you've constantly assumed things that he clearly said he didn't
3 do, including having any knowledge of conversations, verbal
4 conversations between the defendants. He's limited to what the
5 texts are. Go ahead. Five minutes.

6 BY MR. GOLDMAN:

7 Q. Mr. Updegraff, if I have it correct then, that when
8 there is a count in these text messages and you're attributing
9 crack-cocaine to my client solely based upon the quantity that
10 he reports to Mr. West, if West doesn't use the word "hard,"
11 you assume that this is hard as opposed to soft cocaine; is
12 that correct?

13 A. From the text on 11/27, the methodology that we
14 utilized was that Mr. Gadson referred to Mr. West that I'm
15 shoot you the count when I make a hardware play, that if it
16 wasn't anything differentiated towards saying it was hard or
17 soft, I made the assumption or made the evaluation that it was
18 crack-cocaine.

19 Q. And if you're wrong making that assumption, all those
20 numbers on the back end of this exhibit could be wrong because
21 you're putting --

22 MR. STENGEL: Objection, Your Honor.

23 THE COURT: Let him finish. Go ahead.

24 BY MR. GOLDMAN:

25 Q. Because you're attributing drug quantities to

1 crack-cocaine, which could be wrong, correct?

2 THE COURT: You can answer that. Go ahead.

3 THE WITNESS: Yes. I've made this evaluation based
4 on the information that I have. I have no doubt that these
5 coded language is weights attributed to cocaine hydrochloride
6 or crack-cocaine. There are some instances where I cannot tell
7 the difference. There are some that I attributed to on the
8 information provided.

9 BY MR. GOLDMAN:

10 Q. For example, a text dated December 25, 2017.

11 MR. GOLDMAN: Could we pull that up?

12 BY MR. GOLDMAN:

13 Q. Okay. It's simply a text from my client to Mr. West,
14 and at least textually, by text I meant, by a text, West has
15 not asked him anything in this text, right? There's no text
16 from West asking for something, correct?

17 A. Not that I'm aware.

18 Q. So it's safe to assume, is it not, that West has said
19 to Gadson I'm going to need a count on such and such, correct?
20 Because Gadson's now just simply giving a count, correct?

21 A. I'm not sure of the dynamic between Mr. Gadson and
22 Mr. West and his reporting procedures. He's clearly reporting
23 the amount of cocaine or crack-cocaine that he has.

24 Q. So this is just a one-way report from my client to
25 West, one 62nd Street, which is two and a half ounces, one

1 decimal, which is --

2 A. Yeah. The 62nd Street is two and a quarter ounces,
3 and the decimal is an ounce, my interpretation.

4 Q. So Gadson is telling him I got 3,000 -- I'm sorry.
5 What did I just do? 3 ounces. 3 ounces is what he's saying,
6 correct?

7 A. Yes, sir. He reports it 93.1 grams with the bag. An
8 ounce being 28 grams, a bag weighing 1 gram, that's a pretty
9 accurate description.

10 Q. This is a single, solitary action by my client
11 sending something to West which says how much weight he's got.
12 There's no indication that it's crack-cocaine, that it's
13 cocaine, that it's meth, that it's heroin, that it's marijuana
14 in that text, correct?

15 A. I wouldn't agree with that. The 62nd Street is a
16 reference to cocaine or crack-cocaine, along with the decimal.

17 Q. You testified previously that a 62nd Street is a
18 measurement.

19 A. Correct.

20 Q. Right?

21 A. Yes, that's utilized in the distribution of cocaine
22 and crack-cocaine.

23 Q. Unless the people involved in the drug operation are
24 also using those weights and their measures for a different
25 kind of drug, correct?

1 THE COURT: That's argumentative. Next question.

2 BY MR. GOLDMAN:

3 Q. Would you agree with me that they could agree that --

4 THE COURT: That's argumentative.

5 BY MR. GOLDMAN:

6 Q. If 62nd means two and a half ounces, would you agree
7 with me that there's nothing that precludes them from using it
8 for marijuana or for cocaine?

9 THE COURT: That's argumentative. Mr. Goldman, I'm
10 sorry. You're done.

11 MR. GOLDMAN: Please note my objection, if I may,
12 Your Honor. Please note my objection on the record, and it's
13 to the prejudice of my client. Thank you.

14 THE COURT: How long will your redirect be?

15 MR. STENGEL: I have a few things to go through, Your
16 Honor.

17 THE COURT: Ladies and gentlemen, I'd like to
18 complete this witness before lunch break. Go ahead.

19 MR. STENGEL: Thank you, Your Honor.

20 - - -

21 REDIRECT EXAMINATION

22 - - -

23 BY MR. STENGEL:

24 Q. Special Agent Updegraff, let's start where we left
25 off with Mr. Goldman. That's on 12/27/17.

1 THE COURT: No repetition, please.

2 MR. STENGEL: Absolutely, Your Honor. I will try to
3 make this as efficient as I possibly can.

4 BY MR. STENGEL:

5 Q. Do you see 12/25/2017 in front of you? It was a text
6 message we were just talking about where Hans Gadson shoots the
7 count. It's about 90 grams of crack-cocaine.

8 THE COURT: Do you understand the question?

9 THE WITNESS: I do. I'm familiar with that text.

10 BY MR. STENGEL:

11 Q. Okay. So keep going back up. One 62nd Street and
12 one decimal, and we refer to this as crack-cocaine.
13 Mr. Goldman was just asking you there's nothing in that text
14 specifically that allows you to determine whether that's
15 crack-cocaine, correct?

16 A. That is correct.

17 Q. On the very same day, the next text is what? This is
18 now Abdul West, 62 grams of crack-cocaine to Lil Man. What on
19 here makes you think that that's crack-cocaine?

20 A. The third line down, Mr. West is telling this
21 individual that I dropped it straight, 63, "dropped it" being a
22 euphemism for cooking crack-cocaine.

23 Q. And then on -- in the next text is another count on
24 the very same day, right? So here he accounts for the Lil Man
25 text, the Lil Man sale?

1 A. Yes.

2 Q. Going back up to the first one on 12/25, is that why
3 you found that to be crack-cocaine?

4 A. Yes, that and the compilation from the hardware count
5 that we've gone over.

6 Q. There was a text message we spent some time with with
7 both Mr. Hughes and Mr. --

8 MR. GOLDMAN: Excuse me, Your Honor.

9 THE COURT: Overruled.

10 MR. GOLDMAN: I have to put something on the record,
11 Your Honor.

12 THE COURT: No, you don't. Next question.

13 BY MR. STENGEL:

14 Q. There's a 10/13/2017 text message between Jameel
15 Hickson and Jamaal Blanding. Do you see that? And we had
16 pulled up a summary exhibit that you had never seen before,
17 correct?

18 MR. ORTIZ: Your Honor, I'm going to object. If not,
19 I'm going to cross-examine on this.

20 THE COURT: Overruled.

21 MR. ORTIZ: No problem.

22 BY MR. STENGEL:

23 Q. Showing you one page of what's been marked as
24 Government Exhibit -- I think it's 3003. Yeah, 3003. And
25 there's a phone number on that text message attributed to

1 Jameel Hickson. That phone number is ending in 5474. Do you
2 see that phone number on that chart in front of you?

3 A. Yes.

4 MR. ORTIZ: Your Honor, I'm going to object. That
5 phone number is attributed to Mizzo 2.

6 THE COURT: Overruled.

7 BY MR. STENGEL:

8 Q. I think that's the point. This phone number is saved
9 in these phones as what?

10 A. Mizzo 2 and Mel.

11 Q. If we can go back to this text message, the second
12 column from the right, do you see where it says incoming,
13 outgoing, incoming, incoming, outgoing?

14 A. Yes.

15 Q. You weren't involved in putting together the text
16 message part of this, correct?

17 A. Correct.

18 Q. But what does that incoming/outgoing mean to you?

19 A. The first line was incoming to the phone, and the
20 second was a question going out from the phone.

21 Q. And there's a phone, an actual -- it says phone and
22 then a number after it, right?

23 A. Yes.

24 Q. And which phone is it on that text message?

25 A. 215 --

1 Q. I'm sorry. The actual phone. It says phone and then
2 a digit.

3 A. Phone 2.

4 Q. Do you see Phone No. 2 on that chart in front of you?

5 A. Yes.

6 Q. And that is associated with who?

7 MR. HUGHES: Objection, Your Honor. This isn't the
8 witness's chart.

9 THE COURT: Overruled.

10 BY MR. STENGEL:

11 Q. This is associated with whom?

12 MR. HUGHES: Objection. Leading.

13 THE COURT: Overruled.

14 THE WITNESS: Jamaal Blanding.

15 BY MR. STENGEL:

16 Q. Now, going back to the text message here where we're
17 talking about I need one of them ice joints. Whole one? So
18 Mr. Ortiz made this point that it's depending on what the group
19 uses the code for, correct?

20 A. Yes.

21 Q. But when they're using the code, they're using the
22 code to identify what?

23 A. Code to identify substance and quantity.

24 Q. And what do you know about the drugs seized in this
25 case?

1 A. I know the quantities of the methamphetamine.

2 Q. And they were what quantity, what quantity levels?

3 A. Pound quantities.

4 THE COURT: Would you relate the calculation from
5 grams to pounds?

6 THE WITNESS: Yes, sir.

7 THE COURT: How many kilograms in 1 pound?

8 THE WITNESS: 453 grams per pound. A kilogram is
9 2.2 pounds.

10 THE COURT: A kilogram is 2.2 pounds?

11 THE WITNESS: Correct.

12 THE COURT: Go ahead.

13 MR. STENGEL: Let's go to -- there's a text message
14 with Jamaal Blanding and crack on 1/4. That's January 4, 2018.

15 THE COURT: This has the heading Jamaal Blanding.

16 MR. STENGEL: Thank you.

17 BY MR. STENGEL:

18 Q. We're looking at -- so there's a reference here to a
19 Maybach. What do you understand a Maybach to be?

20 A. I understand that to be 62 grams of cocaine or crack.

21 Q. There's nothing in this individual text message
22 exchange that allows you to determine -- when we're talking
23 about 62 grams of something, we're talking about one of two
24 substances, right?

25 A. Yes.

1 Q. What are those two substances?

2 A. Cocaine and crack-cocaine.

3 MR. HUGHES: Objection. Leading.

4 THE COURT: Overruled.

5 BY MR. STENGEL:

6 Q. On this singular text message, is there anything for
7 you to determine whether this reference to Maybach is cocaine
8 or crack-cocaine?

9 A. No.

10 Q. If I show you the text message from January 2, take a
11 look at that.

12 A. Yes.

13 Q. And then I show you the text message from January 6
14 immediately after, does that inform your interpretation of the
15 January 4 text message?

16 MR. HUGHES: I'm sorry. January 2?

17 BY MR. STENGEL:

18 Q. January 2. There's a January 4 text message that we
19 were just looking at with a reference to Maybach. In the
20 PowerPoint presentation, the one immediately before it is on
21 January 4, January 2. The one immediately after that is
22 January 6. And the one on January 6, we see a reference to
23 hardware.

24 MR. HUGHES: Objection, Your Honor. It's different
25 people on different slides.

1 THE COURT: What's the question?

2 Do you understand the question?

3 THE WITNESS: I'm afraid not.

4 THE COURT: All right.

5 MR. STENGEL: My apologies, Your Honor. I'm trying
6 to get through this as efficiently as possible.

7 THE COURT: You're trying to show, if I understand
8 it, you're trying to show from the content on January 2 to
9 January 6 the witness can interpret on January 4.

10 MR. STENGEL: That is correct, Your Honor.

11 BY MR. STENGEL:

12 Q. On January 4 it's a text message exchange between
13 Jamaal Blanding and Abdul West, yeah?

14 A. Correct.

15 Q. And there's a reference to Bras. Do you understand
16 who Bras is?

17 A. I do. Mr. Gadson.

18 Q. And so based on that -- I'm asking this because on
19 January 4 Mr. Hughes was asking you questions, and you said you
20 weren't able to necessarily determine whether it was crack or
21 cocaine on this one.

22 A. Correct.

23 Q. Does it help change that opinion based on the texts
24 from January 2 or January 6?

25 A. I can't be clear, Counselor. I can't.

1 Q. Fair enough.

2 Mr. Meehan was asking you about some text messages on
3 November 27?

4 MR. STENGEL: Your Honor, this is my last line of
5 questioning.

6 BY MR. STENGEL:

7 Q. I want to be clear about something here. Aside from
8 the numbers at the top, what do you understand is happening in
9 this text message between these two individuals?

10 A. My interpretation of this is Mr. Gadson's reporting
11 the quantity of crack-cocaine available, the money that's at
12 the distribution location. Mr. West is asking Mr. Gadson if he
13 took yours, right? My interpretation of that would be that you
14 took your money, your payment for the days, for your work that
15 you've done for today. Then Mr. West is indicating that
16 Mr. Gadson gave him 2,000 out of \$5,000 that he owed.

17 Q. But then after that, the next line is what?

18 A. That's Mr. Gadson telling Mr. West he's going to give
19 him the money and the contraband that's left because he
20 indicates that he hasn't messed up the count, the count of the
21 remaining cocaine and the drug proceeds.

22 Q. So there's a discrepancy between the count?

23 A. That's my -- that's what I interpret from this, yes.

24 Q. And the discrepancy in the count for what substance?

25 A. For crack.

1 Q. And you know that because, if we go to the next page,
2 there's a reference at the bottom to what?

3 A. The hardware play. From now on, every hardware play
4 I make, I'm going to shoot you the count. You know, to try to
5 remedy the discrepancy.

6 Q. Then Mr. Meehan had asked you a question about --
7 there's a text then, I believe it's the next one on
8 November 29, where it goes up to 250 grams, and then there's
9 one on 11/30 where it goes up to 500 grams. And Mr. Meehan was
10 asking you whether the prior two texts could sort of be
11 subsumed in that 500, right?

12 A. Yes.

13 Q. And you acknowledge that it's possible that part of
14 that could be subsumed in that. But based on the time that has
15 lapsed between these text messages and the amounts, what does
16 it appear to you that's happening here?

17 A. My estimation would be that they had distributed
18 amounts and had re-upped or gotten more.

19 THE COURT: Are you almost done?

20 MR. STENGEL: One more question, Your Honor.

21 THE COURT: Go ahead.

22 MR. STENGEL: If we could go back to the
23 11/27 text.

24 BY MR. STENGEL:

25 Q. I just want to be clear. There was a question -- I

1 believe Mr. Goldman asked you at the end about whether, if you
2 were mistaken about one of these texts, whether all of your
3 calculations on the last page would change.

4 A. I recall that.

5 Q. If one of these is inaccurate, would all of the
6 calculations on the back page change?

7 A. No. Just one specific.

8 Q. Right. So now this was -- the numbers on the back
9 page are a conservative estimate, correct?

10 MR. ORTIZ: Objection.

11 THE COURT: Sustained.

12 MR. STENGEL: I apologize, Your Honor.

13 BY MR. STENGEL:

14 Q. This number, the 1,250, accounts for what?

15 A. Monetary value.

16 Q. Monetary value of what? Where does the money come
17 from?

18 A. Distribution of narcotics.

19 Q. And were those narcotics, the narcotics that appear
20 to have been sold, were they included in your tally at the end?

21 A. No.

22 THE COURT: Okay. Thank you. Any recross?

23 MR. ORTIZ: Yes, Your Honor, I do.

24 THE COURT: You can stay there if you want.

25 MR. ORTIZ: I'm going to make this very, very simple.

1 Can you put both exhibits up again?

2 THE COURT: Which exhibits?

3 MR. ORTIZ: The exhibit with 3001.

4 - - -

5 RE CROSS EXAMINATION

6 - - -

7 BY MR. ORTIZ:

8 Q. I'm going to go back to this chart right here, okay?

9 THE COURT: That's 3001?

10 MR. ORTIZ: This is 3003?

11 THE COURT: Go ahead.

12 BY MR. ORTIZ:

13 Q. This number is the one that was indicated to you that
14 was Jameel Hickson's phone, correct? That was told to you,
15 correct?

16 A. No.

17 MR. STENGEL: Objection. That's Jamaal Blanding's.

18 MR. ORTIZ: I need this one here. Here's what we're
19 talking about. Okay.

20 BY MR. ORTIZ:

21 Q. So you see where this number here is listed?

22 THE COURT: Read the number.

23 BY MR. ORTIZ:

24 Q. It's (215) 720-5474, correct?

25 A. Yes.

1 Q. When we went through this chart that we just did,
2 that phone does not appear as a seized phone. Do you see the
3 chart in 3001, the chart in front of you?

4 A. I see it on 3001, but I see it on 3003 that it was
5 seized from Hickson.

6 Q. Where do you see that?

7 A. Seized from Hickson.

8 Q. One would think that, but do you see the chart 3001?

9 A. Right.

10 Q. Those are the seized phones. That's what the jury's
11 been told is a seized phone. That's what I've been told is a
12 seized phone. But you're seeing that seized phone, correct?

13 A. I'm not sure --

14 Q. You're not aware this phone is seized is what I'm
15 saying.

16 THE COURT: This is really not recross.

17 MR. ORTIZ: It is. They are implying things.

18 THE COURT: Ask the question.

19 BY MR. ORTIZ:

20 Q. You do not know if this phone was seized, correct?

21 A. That is correct.

22 Q. All you're reading is what's on this chart that
23 wasn't prepared for you, correct?

24 A. That is correct.

25 Q. The number --

1 THE COURT: He has said that over and over again.

2 MR. ORTIZ: No. It's very important.

3 BY MR. ORTIZ:

4 Q. Phone No. 2, the one you're using in that exhibit
5 that we just looked at, is in the name Mizzo 2, correct? This
6 phone, Phone No. 2 that you just talked to the prosecutor
7 about, Mr. Blanding's phone.

8 A. I'm not sure whether that represents a contact in the
9 phone or what the phone is.

10 Q. Exactly. Assuming even that it's a contact, it's
11 saved as what?

12 A. Mizzo 2.

13 THE COURT: I'm sorry. This is not recross.

14 MR. ORTIZ: Your Honor, they opened this door.

15 THE COURT: Do you have any other questions on
16 recross?

17 BY MR. ORTIZ:

18 Q. And you're not aware if this phone was even seized,
19 correct?

20 A. I am not.

21 THE COURT: He said that already.

22 MR. ORTIZ: No further questions.

23 THE COURT: All right. Thank you.

24 Ladies and gentlemen, that completes the testimony of
25 this witness.

1 Any other witnesses?

2 MR. WITHERELL: We do, Judge. We have another
3 witness. We want to clear something up. We want to call Agent
4 Becker quickly.

5 THE COURT: Call which agent?

6 MR. WITHERELL: Agent Becker.

7 THE COURT: All right. Right now. How long will
8 this take?

9 MR. WITHERELL: Just five minutes.

10 (Witness excused.)
11 - - -
12 DIRECT EXAMINATION
13 - - -
14 BY MR. STENGEL:
15 Q. Special Agent Becker, you put this together, correct?
16 A. Yes.
17 Q. You have testified to Government Exhibit 3003
18 previously, correct?
19 A. I testified to all of this last week.
20 Q. And I'm going to start with 3001. 3001 shows certain
21 numbers of phones, correct?
22 A. Correct.
23 Q. That were seized during this investigation?
24 A. This document refers to seized phones. The last
25 column refers to the number attributed to that seized phone.

1 Q. Attributed or it was actually on the phone?

2 A. Extracted from that phone.

3 Q. Are these all of the phones seized in the course of
4 this investigation?

5 A. No.

6 Q. What are these phones?

7 A. Phones that we have entered evidence from in this
8 case.

9 Q. Phone Number 2 came from which defendant?

10 A. Defendant Jamaal Blanding.

11 Q. In phone Number 2, was this phone number 215-720 --

12 MR. MEEHAN: That's objected to because he's
13 testifying.

14 THE COURT: Let him finish the question.

15 BY MR. STENGEL:

16 Q. Do you see a phone Number 2 on that chart?

17 A. Yes.

18 Q. In what context? Explain it for us, please.

19 A. Okay. Phone number (215) 720-5474, the number that
20 has now been testified to ad nauseam, is attributed to
21 Defendant Jameel Hickson for numerous reasons. Looking at the
22 chart, that number is saved in Phone No. 1 as Mel. That number
23 saved in Phone No. 2 --

24 MR. ORTIZ: I'm going to object. He's attributing it
25 to Mr. Hickson.

1 THE COURT: Let him finish the answer.

2 THE WITNESS: That number is saved in Phone No. 2 as
3 Mizzo 2. In phone 17, it's saved as Mel. In phone 19, again,
4 Mizzo 2. In phone 39, Mizzo 2.

5 Now, if you look to the far right, the nickname
6 associated with Mr. Hickson, that his counsel has also
7 associated with him, Melliano, is Mr. Hickson's nickname.

8 MR. ORTIZ: I have not.

9 THE WITNESS: Yes, you did. The first day.

10 Lastly, there's a text message we displayed where
11 Defendant Blanding asks Defendant West, says he has the 720
12 number and asks for the other. Mr. West then provides Blanding
13 with the number associated with Jameel Hickson ending in 8500.
14 That number is (818) 425-8500.

15 THE COURT: Any other questions?

16 BY MR. STENGEL:

17 Q. Do you see what's on the screen in front of you?

18 A. I do.

19 Q. This is the text message that we've been talking
20 about quite a bit. I just want to be clear because Special
21 Agent Updegraff did not create the text, right? Who created
22 this PowerPoint presentation, the text version of it?

23 A. I did.

24 Q. So could we just explain what this -- if you could
25 explain for the jury sort of what we see here.

1 A. Yes.

2 THE COURT: Didn't he already do this yesterday or
3 the day before?

4 MR. STENGEL: We have talked about this, but it's
5 been misconstrued during Special Agent Updegraff's testimony.

6 THE COURT: Explain what the columns are.

7 THE WITNESS: Yes. This was taken as a text message
8 from Phone No. 2. The overwhelming majority of the slides in
9 this presentation were iMessages where you can send from an
10 iPhone to another iPhone. It's separate from a text message.
11 It's an iMessage. This actual message here is a text message,
12 so the format from the extraction of the phone is different.

13 The first column is just the number of the message
14 associated with that phone. The second number is the number
15 that the conversation is with. So the number ending in 5474
16 means that Phone No. 2 is having a conversation with that
17 number. Now, Phone No. 2's number that we extracted from it is
18 a number associated with Defendant Blanding ending in 4737.

19 The third column is simply the contact name that that
20 number is saved under. So, again, the number ending in 5474 is
21 saved as Mizzo 2.

22 The next column, the time stamp is pretty
23 self-explanatory. The next column is whether that text was
24 sent or read, meaning that if a text message was read, it was
25 received. If it was sent, it was an outgoing message.

1 The next column refers to whether that message was
2 saved in the phone. So an incoming message would obviously be
3 saved in the inbox. An outgoing message would be sent.

4 Next column is where that message is stored. It was
5 stored in the phone, where it was extracted from.

6 Second to last column is whether that message was
7 incoming or outgoing. For example, again, this message was
8 extracted from Phone No. 2 taken from Jamaal Blanding.

9 Incoming message would mean the message that he received was
10 coming from a separate number, the 5474 number. Outgoing
11 message would mean that Mr. Blanding sent a message to that
12 number.

13 And, again, the last column is the body or the
14 content of that message.

15 THE COURT: Any cross?

16 MR. ORTIZ: Absolutely.

17 - - -

18 CROSS-EXAMINATION

19 - - -

20 BY MR. ORTIZ:

21 Q. I can't talk about what's not in evidence. Let's
22 talk about what's in evidence. That is the list of seized
23 phones, the phones that are here in front of the jury.

24 THE COURT: When you say "that," you're talking
25 about?

1 BY MR. ORTIZ:

2 Q. That, for the last time, 3001 is the seized phones,
3 correct?

4 A. Some of the seized phones.

5 Q. But you're not talking about seized phone 5474,
6 correct?

7 A. No. I'm talking about seized phone ending in 4737.

8 Q. Right. So you're not presenting 720-5474 to the
9 jury. It's not a seized phone that's in evidence, correct?

10 A. No. I'm presenting the number.

11 Q. The number, just the number, correct?

12 A. Correct.

13 Q. And the number that's receiving the call, it has the
14 person calling saved as Mizzo 2, correct?

15 A. Correct.

16 Q. That's what it's saved as, correct?

17 A. In this one phone, yes.

18 Q. I'm conceding all of that. I agree with all of that.
19 But when this text is sent, it's saved as Mizzo 2, correct?

20 A. Yes.

21 Q. So you're trying to say it's my client's phone. When
22 Blanding tells West he has the 720 number, does he give the
23 full number or just the 720 number? Let's start with that.

24 A. He says 720.

25 Q. Just 720?

1 A. Correct.

2 Q. So assuming, assuming just for the sake of argument,
3 that that phone is being passed around, he's essentially saying
4 he has the 720 number, but it doesn't mean that that phone was
5 seized at Mr. Hickson's house, correct?

6 A. I never said that.

7 Q. I'm just making it clear. So that phone was not
8 seized in Mr. Hickson's house, correct?

9 A. Correct.

10 Q. When he did not know you were coming, correct?

11 THE COURT: Well, that's repetitive.

12 BY MR. ORTIZ:

13 Q. You found eight phones, old phones, new phones,
14 correct?

15 A. We found numerous phones at Mr. Hickson's apartment.

16 Q. When the other agent was looking at it, just like me,
17 it's not a seized phone. It's not on 3001, correct?

18 A. Correct. I don't think we seized a phone with that
19 number.

20 THE COURT: He said that many times.

21 BY MR. ORTIZ:

22 Q. When a text is sent to the phone he has as 720,
23 assuming it's even that, when it's being sent, it's being sent
24 to somebody who is saved as Mizzo 2, correct? The person who
25 is receiving it has it saved as Mizzo 2, correct?

THE COURT: He said that.

BY MR. ORTIZ:

Q. Assuming it's Mr. Blanding?

THE COURT: Agent, you've already said that, correct?

THE WITNESS: Yes.

MR. ORTIZ: No further questions.

THE COURT: Okay. That completes this witness.

Does the Government have any other witnesses?

MR. STENGEL: I believe we rest, Your Honor.

THE COURT: Ladies and gentlemen, the Govern

THE COURT: Ladies and gentlemen, the Government has now rested its case, so we're going to take a lunch break. I believe we will have some testimony this afternoon. When you come back, I'll give you an idea of what's happening. But enjoy your lunch now. Lunch is waiting for you. So I'd like to keep it to a half hour. Is a half hour enough for you, ladies and gentlemen? All right. We're resume at 12:30.

Everyone remain seated.

(The jury exits the courtroom at 12:59 p.m.)

(Witness excused.)

THE COURT: Okay. I have a phone call waiting for me, so, Mr. Hughes, you want your expert to go next first?

MR. HUGHES: Please, Your Honor.

THE COURT: Then Mr. Ortiz?

MR. ORTIZ: I'm not calling my expert. I'm going to

1 use his expert.

2 THE COURT: Anybody else have any testimony?

3 MR. GOLDMAN: Your Honor, I want to put something on
4 the record either before --

5 THE COURT: Do that when I come back. All right. So
6 we just have the one expert. Is that all that's going to
7 testify this afternoon?

8 MR. HUGHES: Yes, Your Honor.

9 THE COURT: All right. We'll talk about whether --
10 I'd like to have some of the arguments this afternoon. I think
11 I'm going to ask the Government to be prepared this afternoon.
12 So we'll have all the defense arguments Monday morning and then
13 the Government rebuttal.

14 MR. WITHERELL: I didn't hear the last part, Judge.
15 You want me today but the defense wouldn't go until Monday?

16 THE COURT: No, no. We're going to have direct
17 examination of their expert and your cross. Then, as I
18 understand it, the defendants will rest. Then we're going to
19 have a very short charge conference, and then you'll give your
20 closing.

21 MR. WITHERELL: Right. I understand that. My
22 question then becomes, though, we wouldn't hear from the
23 defense until Monday I'm guessing.

24 THE COURT: The defense will close on Monday, and
25 you'll do your rebuttal on Monday. And then we'll have the

LEFF - DIRECT ON VOIR DIRE

1 charge. Thank you. 1:30. Please be on time.

2 (Whereupon a luncheon recess is taken.)

3 MR. GOLDMAN: Your Honor, could I put something on
4 the record before they come out?

5 THE COURT: No. We'll do it later.

6 Where is the witness?

7 MR. HUGHES: Mr. Leff, please take the stand.

8 (The jury enters the courtroom at 1:38

9 p.m.)

10 THE COURT: Okay. Ladies and gentlemen of the jury,
11 we're back. This is a defense witness. Of course, you
12 understand that we already had a couple defense witnesses that
13 we called out of turn, but now that the Government has rested,
14 we will now proceed with this witness.

15 Who is going to be the lead questioner? Mr. Hughes?

16 MR. HUGHES: Yes, Your Honor.

17 THE COURT: Do you want to come up to the podium?

18 Swear the witness, please.

19 THE CLERK: Please raise your right hand.

20 (Witness sworn.)

21 THE CLERK: Thank you.

22 THE WITNESS: David Leff, L-E-F-F.

23 - - -

24 DIRECT EXAMINATION ON VOIR DIRE

25 - - -

1 BY MR. HUGHES:

2 Q. Good afternoon, Mr. Leff.

3 A. Good afternoon, sir.

4 Q. Mr. Leff, please tell the ladies and gentlemen of the
5 jury what your occupation and field of study is?

6 A. My official title is a forensic narcotics consultant
7 and expert as well as lecturer. I started in 1980, getting a
8 bachelor degree in 1982 at Glassboro State College, now known
9 as Rowan University, in law and justice.

10 While there, I attended classes both on the
11 undergraduate and graduate level in drug education, and I also
12 lived at a drug treatment facility as part of the curriculum
13 for college.

14 Subsequent to that --

15 MR. HUGHES: Can we display Mr. Leff vitae?

16 THE WITNESS: It's there.

17 MR. HUGHES: Oh, sorry. Go ahead.

18 THE WITNESS: Subsequent to that, I spent 12 years as
19 a State of New Jersey criminal defense investigator for the
20 department of the public advocate, office of the public
21 defender. My job duties started out in March of 1980 to
22 interview individuals, locate witnesses, speak to witnesses,
23 examine physical evidence, and testify in court when
24 appropriate.

25 When I was first qualified as a narcotics expert in

1 Salem County Superior Court in 1984 -- that scared me -- my
2 duties shifted somewhat in that I spent much more of my time as
3 a narcotics expert doing the entire state of New Jersey for all
4 21 counties in New Jersey, department of the public advocate,
5 public defender.

6 I attended many lectures given by the department of
7 the public advocate, leaders of different fields. I've had
8 training in chemistry, pharmacology, and toxicology. I also
9 attended, for nine years, the New Jersey Narcotic Enforcement
10 Officers annual conferences. I received instruction through
11 that organization from the FBI, DEA, ATF, New Jersey State
12 Police, customs, as well as many other federal, state, and
13 local agencies from Albuquerque, New Mexico, to the NYPD.

14 I've had a lot of formal training in those areas,
15 mostly in law enforcement, but my real understanding of drug
16 education comes from the streets. It comes from the 10,000,
17 and that's a very conservative number, over the last 40
18 years -- I started in 1980, just short of 40 years. I spent my
19 whole adult life in this field. Almost 40 years in narcotics,
20 understanding in the participation of learning new aspects.

21 And I stay current all the time. For example, the
22 advent of -- although it's not new, fentanyl, that coming to
23 the east coast in, like, 2016 is when we first started really
24 seeing it, and now it's everywhere. You just have to stay
25 current.

1 For that, what I do is, I go to the Philadelphia
2 Police Laboratory maybe once every two to three weeks. I
3 examine the physical evidence. I've examined all drugs,
4 including heroin, crack, cocaine, PCP, methamphetamine, both
5 the biker meth, which is the brown meth, as well as what we
6 have here, crystal methamphetamine. And I stay current also by
7 constantly reviewing Department of Justice, DEA, and FBI
8 reports on intelligence gathering from all over the country.

9 I've spent a huge amount of time on the street
10 speaking with drug users and drug dealers. I've been offered
11 to purchase drugs hundreds of times. I've negotiated the
12 prices of drugs just out of not being put further in danger.
13 Been approached by enforcers with guns in their waistbands.
14 I've never purchased any drugs on the street. I don't have a
15 letter of immunity from the US Attorney or the District
16 Attorney's Office, and I'm not a sworn law enforcement officer.
17 I've never been a police officer with arrest powers, so I've
18 never served a search warrant. I don't do arrest warrants.
19 But I speak to the individuals that do that.

20 Most of the individuals that I associate with,
21 actually socially as well as professionally, are law
22 enforcement. I routinely discuss cases with other experts in
23 the field, other Government experts that are Philadelphia
24 Police Officers and other experts.

25 I constantly talk with expert chemists,

1 pharmacologists, whether it be a pill case. I'm always at the
2 local pharmacy. I have a very well established relationship,
3 for example, with the pharmacist when I have a pill case, and
4 I'll ask him questions about -- I had a recent alprazolam case,
5 a Xanax case, and we discussed the maximum usages. Although I
6 know that information already, I want to also get it from
7 different sources. So my obtaining of information is from, I
8 suppose you can call it, the sterile environment of a classroom
9 in my formal education, the street where I've spent many, many
10 days and nights speaking to these individuals, buyers and
11 sellers. I've been in some precarious situations. I've been
12 attempted to be robbed. Guys come up to me with guns. I've
13 worked murder cases in very high drug and crime areas.

14 I also lecture. That's another function that I do.
15 I've taught five classes at the Penn State University. I've
16 taught at Villanova Law School, juvenile attorneys. I was
17 flown to Pittsburgh, Harrisburg. I've done panel discussions
18 with doctors and prosecutors. I've taught judges, Superior
19 Court -- not Superior Court, Common Pleas Court judges from
20 Luzerne County and Philadelphia County in narcotics trafficking
21 and trends and the different thing that is go on.

22 I came to Philadelphia in 2002, so I've been here
23 going on 18 years. I know the streets in Philadelphia like the
24 back of my hand. I know the stamps on the heroin. I easily
25 interpret the laboratory reports. I'm constantly receiving new

1 cases, not only from Philadelphia, but from other places. I'll
2 be flying out to Cincinnati, Ohio, to do another federal case
3 there.

4 BY MR. HUGHES:

5 Q. Speaking of federal cases, have you been qualified as
6 an expert in United States District Court for the Eastern
7 District of Pennsylvania, the court in which we now sit?

8 A. Yes.

9 Q. How many times have you been qualified for an expert
10 in this court?

11 A. In just the Eastern District of Pennsylvania, I would
12 say over 15 times. I've qualified twice in the last three
13 months, Judge Pratter and Judge Beetlestone. Like I said, in
14 the last two or three months.

15 But I've also qualified in Superior Court, Municipal
16 Court, Common Pleas Court in Massachusetts, in Washington, DC,
17 in Delaware. I've qualified a total of 713 times.

18 Q. And this process that we're going through right now
19 is essentially the qualification process, if you will, correct?

20 A. Correct. Just like Agent Updegraff, the same kind of
21 thing. This is my CV, curriculum vitae or resume, that's on
22 the screen, which indicates a very succinct version on one
23 page. If I were to put down 40 years of experience, I'd have
24 probably 500 pages, but for purposes of judicial economy and
25 courtroom presentation, I limit it to one page.

1 Q. Now, you've detailed, I believe, over 10,000 drug
2 cases that you've testified in and have been involved in,
3 correct?

4 A. Been involved in.

5 Q. I'm sorry, been involved in. And then some number
6 less than that, you've testified, and do you have an
7 approximation of the number of cases you've been qualified as
8 an expert in?

9 A. The last case I testified in was a federal case here
10 for the Eastern District of Pennsylvania, which would be
11 Number 713.

12 Q. 713, okay. Thank you.

13 MR. HUGHES: Offer Mr. Leff for cross on his
14 qualifications.

15 MR. STENGEL: Thank you. Just briefly on voir dire.

16 - - -

17 CROSS-EXAMINATION ON VOIR DIRE

18 - - -

19 BY MR. STENGEL:

20 Q. Mr. Leff, good afternoon.

21 A. Good afternoon, sir.

22 Q. So 713 times you've been qualified as an expert?

23 A. That's correct.

24 Q. And the last two, 711 might have been in front of
25 Judge Pratter and 712 might have been in front of Judge

1 Beetlestone?

2 A. Yes.

3 Q. Then you had referred to your title at the beginning.

4 There's quite a bit of information there. And you referred to
5 your title as a forensic narcotics consultant/expert; is that
6 correct?

7 A. Correct.

8 Q. Where did that title come from?

9 A. Well, it's a title of what I do on a daily basis. No
10 one per se. The United States Government didn't give me that
11 title. I'm not licensed in that title per se. It just sums up
12 what I do.

13 Q. Okay. Sure. It's the title that you've given to the
14 work that you do, correct?

15 A. Correct.

16 Q. But the title of expert or the 713 times that you've
17 been qualified as an expert, that's not what makes you an
18 expert, correct?

19 A. No. It's my continuation of work in this field for
20 40 years.

21 Q. Right. It's your training and your experience,
22 right?

23 A. Correct.

24 Q. We talked quite a bit of your experience on a whole
25 variety of things. I just want to make sure we have the right

LEFF - CROSS ON VOIR DIRE

1 training and experience for this particular case.

2 A. Sure.

3 Q. You mentioned you attended some lectures, and I
4 believe you said 9 years running at the New Jersey annual
5 conference for something?

6 A. The New Jersey Narcotic Enforcement Officers.

7 Q. Thank you. I couldn't read my own writing.

8 And that is -- how long of a conference is that?

9 A. The three to four days.

10 Q. Who teaches at conferences like that?

11 A. FBI, DEA, state police, ATF, customs, postal
12 inspectors, Attorney General's Office, Pennsylvania narcotics.

13 Q. Guys like Agent Updegraff?

14 A. I never received any instruction from him but
15 similar.

16 Q. Similar backgrounds, yeah?

17 And you had -- you mentioned some trainings in
18 pharmacology, some formal trainings in law enforcement, but
19 then you talked about the streets.

20 Did I understand this correctly, that you have social
21 interactions with individuals from law enforcement?

22 A. And professional.

23 Q. And professional, and you interact with them and sort
24 of glean knowledge from them, correct?

25 A. It's quid pro quo. They glean knowledge from me as

1 well.

2 Q. Fair enough. And then there's going out on the
3 street and talking to drug users, correct?

4 A. And drug dealers.

5 Q. And drug traffickers?

6 A. Correct.

7 Q. When you're talking about drug -- and when you're
8 talking to drug users, you're approaching them on the street
9 while they're using narcotics?

10 A. I've seen, hundreds of times, individuals smoking
11 crack, shooting heroin. There isn't virtually a day that goes
12 by that I don't smell burning marijuana.

13 Q. Walking down the streets of Philadelphia these days,
14 that's a true statement.

15 But here, we're talking about a distribution of
16 quantities of narcotics and coded language, correct?

17 A. Correct.

18 Q. And when you're talking to users, are you talking to
19 them about distribution amounts of narcotics?

20 A. What I'm talking to them about is the effects of the
21 drugs, how much they're paying for it, how long the drug lasts.
22 When I talk to dealers, most of the time --

23 Q. Before we get to dealers, let's stay on addicts. So
24 you're talking about smaller quantities when you're talking to
25 them, correct?

1 A. To the users.

2 Q. Yeah. And you said you've seen them shooting up or
3 smoking crack on the street, correct?

4 A. Correct.

5 Q. So you walk up with them while they're doing drugs
6 and start talking to them about doing drugs?

7 A. Well, based on another situation, I had a daughter
8 that was missing. She was out tricking on the street. She was
9 a heroin user and crack user. I spent months getting to know
10 drug users in a particular location, in East Division, 24th,
11 25th, and 26th Districts in Philadelphia. They all knew me; I
12 knew them. I had my own, if you want to call them, CS's. I
13 had their phone numbers. I discussed with them. They felt
14 safe with me because they knew why I was there. I wasn't
15 dressed like this.

16 Q. Sure, sure. That's a very personal mission then?

17 A. But I also did it -- being there gave me the
18 opportunity to also learn additional first-hand information,
19 actually smell the odor of burning crack.

20 Q. Sure. How does the odor of burning crack affect the
21 terms that are used in drug trafficking? How does that inform
22 you as to the terms used in drug trafficking?

23 A. Well, for a drug user, they will tell me certain
24 things that they're talking about. For example, I wanted to go
25 with this girl Jessica. She's actually still in my phone. I

1 named her Jessica underpass because she was living at Emerald
2 City under the underpass at 2700 Emerald Street. And she was
3 going to purchase some heroin. I asked her -- I wanted to go
4 to the delivery point, the stash house, and she talked about it
5 being a trap house. You pick up the terms over long periods of
6 time, and you're familiar with the vernacular that's used by
7 the dealers.

8 Q. You just named one, a trap house, correct?

9 A. Yes.

10 Q. But when you're talking to Jessica underpass, you're
11 talking about a consumer amount of heroin, correct?

12 A. In that particular situation, yes.

13 Q. But you're not talking about -- say Jessica was not
14 doing heroin. Say Jessica was smoking crack.

15 A. She did that too.

16 Q. She did that too. So you're not talking to her
17 about -- Jessica who is smoking crack in the underpass is
18 probably not purchasing 62 grams of crack at a time, correct?

19 A. She absolutely did not purchase --

20 Q. So you're not learning from her what the slang for a
21 62.5-gram quantity of crack-cocaine would be, right?

22 A. That would be correct.

23 Q. Then you mentioned you're going to the points of
24 supply, right? So you're going to trap houses, and you're
25 talking to drug dealers?

1 A. 3000 Water Street, 3100 Weymouth. That's correct.

2 Q. And you're negotiating deals with the drug dealers?

3 A. Talking about the pricing, what they had available on
4 the street, what stamps were they selling. Things like that,
5 yes.

6 Q. And you don't then purchase drugs, correct?

7 A. That would be illegal.

8 Q. So you're telling me you walk up at night to a trap
9 house, negotiate some prices for drugs, and then you walk away?

10 A. When I was at 3100 Weymouth, the lookout at the head
11 of the block on Allegheny, I had my cell phone out and he said,
12 the rules of the block, there are no cell phones allowed out.
13 And there were a lot of sellers on that block I saw counting
14 money duck down between two cars. And I said whose rule is
15 that? He said it's the owner's rule of this block. I put my
16 phone away, I walked down Weymouth, and he said, well, what are
17 you looking for? And I said powder. And he said, well, I'll
18 see if I can get it. And he ran away.

19 Now, obviously if he had come back with powder, I'd
20 be in a bad situation because I'm not going to buy it from him.

21 Q. Right. It's a bad situation to walk up on some block
22 one night and say, hey, I'm looking to buy some drugs, they say
23 here's the drugs, and you walk away/we can all agree that's
24 not --

25 A. Well, A lot of the narcotics guys kid me at the CJC

1 the Criminal Justice Center, that I have a death wish going to
2 places doing that kind of thing, but as a fact of reality, I
3 think that it's an important part of my job.

4 Q. And no doubt that experience is an important part of
5 expertise, but if you're going up and you're asking for a
6 substance and then when they leave, you're leaving, you've
7 never finalized that deal, right? You don't know what it's
8 worth?

9 MR. HUGHES: Your Honor, I think this is outside the
10 scope -- I'm sorry, Mr. Stengel -- outside the scope of voir
11 dire.

12 MR. STENGEL: Your Honor, this goes directly to the
13 basis of his experience and his knowledge.

14 THE COURT: Overruled.

15 BY MR. STENGEL:

16 Q. So, you have your personal relationships with law
17 enforcement where you're gleaning information from each other.
18 You have information you pull from addicts like Jessica
19 underpass, and you have information that you're pulling from
20 the outskirts of the drug trafficking organization, right? But
21 you're also an expert, correct? You're a paid expert?

22 A. That's correct, but you're leaving out another
23 portion.

24 Q. Please, please.

25 A. I also deal with very high-level drug trafficking.

LEFF - CROSS ON VOIR DIRE

1 I've read tens of thousands of pages of wiretap intercepts, of
2 text phone transcripts, of the actual audio of surveillance,
3 pole camera surveillance, MVR surveillance, body cam. I've
4 been to Rikers Island talking to cartel members, I've been
5 involved in international drug trafficking. I've testified as
6 an expert in the Eastern District of Philadelphia, 30 pounds of
7 cocaine.

8 THE COURT: Do you have any other questions?

9 MR. STENGEL: Just a couple.

10 BY MR. STENGEL:

11 Q. You just mentioned that you reviewed wiretaps.
12 You're not a police officer and you never have been, correct?

13 A. Correct.

14 Q. You never listened in to a wiretap live, correct?

15 A. Not live.

16 Q. You've read pages after through your representation
17 or through your being hired as a defense witness, correct?

18 A. Well, I've listened to the actual audio, and I've
19 went along with the line sheets.

20 MR. STENGEL: Your Honor, we'll accept him as an
21 expert in --

22 THE COURT: This witness is also qualified as an
23 expert and can give you opinions, and it's for you to determine
24 the credibility and weight that you give to every witness
25 including experts.

1 Okay. Proceed, please.

2 - - -

3 DIRECT EXAMINATION

4 - - -

5 BY MR. HUGHES:

6 Q. Thank you, Mr. Leff.

7 Mr. Leff, had you had an opportunity to --

8 THE COURT: Pull the microphone close.

9 BY MR. HUGHES:

10 Q. Have you had an opportunity to review discovery
11 materials in this case?

12 A. Some discovery. I became involved in -- aware of
13 this case perhaps a year ago. I sat in on some testimony on
14 some prior hearings maybe six months ago, but I didn't actually
15 look at any discovery until a couple of days ago when I became
16 a true part of this case.

17 Q. Understood. Now, in reviewing the discovery
18 materials, was part of it -- can we display 3004?

19 Are you familiar with this?

20 And it can be displayed to the jury, please. Thank
21 you.

22 A. I printed out this entire document, yes.

23 Q. You're familiar with this document?

24 A. Yes.

25 Q. You also were present when Special Agent Updegraff

1 testified, correct?

2 A. Correct. I've been here for two full days, yes.

3 Q. Two full days.

4 Fair to say there's a lot of contention around
5 certain interpretations of language, correct?

6 A. Yes.

7 Q. The usage of or the assigning of drug weights
8 throughout this document is based on Special Agent Updegraff's
9 read of the text messages. And you've read this document, and
10 you've heard Special Agent Updegraff's testimony, correct?

11 A. Correct.

12 Q. I call your attention to the fourth slide in. It's
13 the October 13th slide. This slide has -- the jury's seen this
14 one before obviously.

15 Do you see the information exchange that is taking
16 place here?

17 A. Yes.

18 Q. Now, we'll set aside for argument's sake that there
19 is an exchange of information, but based on what you're seeing
20 here, are you able to conclude, as Special Agent Updegraff did,
21 that joint means pound?

22 A. No.

23 Q. And a step further -- I'm sorry. Strike that.

24 Why is that?

25 A. Joint is a common word that's used, and I've seen it

1 many times in wiretap intercepts. It's almost synonymous with
2 jawn. It can mean person, place, or thing. It's a noun. It
3 can mean anything. This could be a jawn, this could be a
4 joint. But putting it into drug reference, joint is usually
5 associated as an old head of a rolled marijuana cigarette.

6 Within that same short text it talks about ice, and
7 ice certainly could be interpreted, and is well known, as
8 methamphetamine or crystal, but --

9 Q. Let me stop you right there. I'm sorry.

10 What else can ice mean?

11 A. Marijuana. There's a very famous hybrid strain of
12 marijuana called ice. It's a hybrid strain of indica and
13 sativa with about 20 percent THC, which comes from the West
14 Coast.

15 Q. I want you to take a look at an exhibit. There we
16 go.

17 Can you take a look at this exhibit for purposes of
18 identification? Do you recognize what is on this?

19 A. Well, it's a Google search for the images to show
20 purple ice, and there are numerous entries, so it's not an
21 isolated type. Sometimes you do a Google search and nothing
22 will come up or one item will come up. This is obviously
23 something that is well known. And this is purple ice, which is
24 a variation of ice that I was speaking of. There's also ice
25 cream. There's many different --

1 Q. So purple ice is a type of ice weed, ice cream is a
2 type of ice weed; is that correct?

3 A. Yes.

4 Q. Are there images there depicting this type of
5 marijuana?

6 A. That's correct.

7 MR. HUGHES: Your Honor, I ask to publish it to the
8 jury.

9 THE COURT: Yes.

10 MR. HUGHES: Thank you.

11 BY MR. HUGHES:

12 Q. Now, there are other times in the Government exhibit
13 that we have spent a lot of time with, 3004, in which the term
14 "zip" is thrown around -- or excuse me, used.

15 What does zip mean to you?

16 A. Well, I would have to disagree with the special agent
17 that testified earlier. A zip -- although I found him to be
18 very knowledgeable and very qualified, and I agree with a
19 substantial portion of what he had indicated. He's very
20 knowledgeable.

21 On the other hand, a zip does not mean
22 methamphetamine, and a zip does not have to mean 1 ounce. It
23 can be. I mean, I can't preclude the possibility that it would
24 be an ounce of methamphetamine, but to make that jump and say a
25 zip is methamphetamine would be somewhat ridiculous.

1 A zip could be -- there are zip-lock bags. At very
2 low levels, zip-locks come in small as 1212, half inch by half
3 inch for crack or it could come in 2020. These are just code
4 numbers for the Apple company from China. 2 inches by
5 2 inches, which is usually a marijuana bag, but it could store
6 other things, pretty much any drug.

7 So to suggest -- and even when you take it further,
8 which will be I'm sure your next question, if you take it
9 further in the context of the conversation, it doesn't reach
10 the level of reasonable professional certainty to say that it's
11 an ounce of methamphetamine.

12 Q. So it's fair to say that the term "zip" is a term of
13 weight, not substance?

14 A. It's a term of weight or packaging, but definitely
15 not substance.

16 Q. Understood. The term "glass" has also been used
17 frequently. What can glass mean?

18 A. Well, in the drug world, glass can mean one of three
19 different drugs that I'm aware of.

20 Q. What are those three?

21 A. LSD, also known as panes or window pane, gelatin. Or
22 marijuana, I'm familiar with glass slipper. There are
23 literally hundreds, as Agent Updegraff indicated as well.

24 THE COURT: You're going beyond the question that was
25 asked.

1 Next question.

2 THE WITNESS: Sorry, judge.

3 BY MR. HUGHES:

4 Q. What is shatter glass?

5 A. Well, shatter, or honeycomb, are forms of hash oil
6 that have been created that resemble the appearance of being
7 shattered or of a bee honeycomb, but it's THC. It's
8 concentrated THC, delta nine or marijuana.

9 MR. HUGHES: Your Honor, may I use the ELMO? We're
10 having some technical issues.

11 MR. STENGEL: Your Honor, we seem to be pulling up
12 Google searches.

13 MR. HUGHES: That's right.

14 MR. STENGEL: I'm not sure that marking a Google
15 search makes sense.

16 MR. HUGHES: It's been PDF'd.

17 THE COURT: Ask the question.

18 MR. HUGHES: Yes, Your Honor.

19 MR. STENGEL: By whom?

20 BY MR. HUGHES:

21 Q. Mr. Leff, please take a look at this image. Do you
22 recognize what it is?

23 A. It's concentrated delta nine. It's resin that is
24 cooked in a way with butane hash oil in a process that creates
25 concentrated THC.

1 Q. Is this the marijuana concentrate shatter glass that
2 you're referring to?

3 A. Yes.

4 MR. HUGHES: I ask this be published to the jury.

5 MR. STENGEL: Objection, Your Honor.

6 THE COURT: Next question.

7 MR. HUGHES: May the image be published, Your Honor?

8 THE COURT: Yes. You can show it. Admitted.

9 MR. HUGHES: Thank you, Your Honor.

10 BY MR. HUGHES:

11 Q. Now, you're aware that during the course of this
12 investigation, multiple substances were recovered, including
13 multiple pounds of marijuana?

14 A. Yes.

15 Q. Cocaine?

16 A. Yes.

17 Q. Hard and soft?

18 A. Yes.

19 Q. Crack-cocaine, powder cocaine, methamphetamine, and
20 heroin?

21 A. Yes.

22 Q. When the term -- when numbers are used in text
23 messaging and weight references are used without -- when weight
24 and numbers are thrown around and all these substances are in
25 an investigation, what does that mean to you?

LEFF - CROSS

1 A. Well, it makes it much more difficult to be able to
2 distinguish what drug is being talked about and to distinguish
3 who did what. Usually, it is corroborated by undercover
4 purchases, surveillance, controlled buys, actual physical
5 recovery in conjunction with that text message. In other
6 words, I'll meet you at such and such a location, I'm going to
7 be bringing an eighth or an eight ball or 125 grams, which is
8 an eighth of a kilo, and then the police are there and they
9 arrest the person and the person's got -- he has 125 grams.

10 THE COURT: Okay. That's your answer. Go ahead.

11 MR. HUGHES: No further questions, Your Honor.

12 THE COURT: Cross-examine.

13 MR. ORTIZ: Your Honor, I have some questions.

14 THE COURT: You've got a question, Counsel?

15 Mr. Ortiz.

16 - - -

17 CROSS-EXAMINATION

18 - - -

19 BY MR. ORTIZ:

20 Q. I just have a few questions.

21 A. Yes, sir.

22 Q. So you've been here for two days, correct?

23 A. Yes.

24 Q. And you've seen a lot of this testimony, correct?

25 A. I've seen all of the testimony. I've never left the

1 room for two days.

2 Q. You talked about the ice weed, correct?

3 A. Yes.

4 Q. And when you looked at that exhibit, I know I talked
5 to you before you testified a little earlier today, there's
6 this term, and I think even Agent Updegraff mentioned that the
7 word "whole" can have multiple meanings, correct?

8 A. Right. It has no definitive specific definition, a
9 whole of whatever it is.

10 Q. It's a normal English word. It's just whole. It's
11 not, like, a special word like glass or anything fancy,
12 correct?

13 A. Whole does not mean pound. They're not synonymous.

14 Q. It's not even synonymous, and you have to know a lot
15 more about what you're dealing with to even know that, correct?

16 A. Correct.

17 Q. When we're talking about this person Mizzo two,
18 that's the only -- you have that exhibit, right? That exhibit
19 he was talking about, the blue exhibit.

20 A. The blue exhibit?

21 Q. With all the conversations and texts.

22 A. Oh, right. Yes.

23 Q. So that's the only one that involves Mizzo two, and I
24 believe it has this unique language that you pointed out about
25 ice joint, right?

1 A. Yes.

2 Q. And that also is not seen anywhere else in that
3 exhibit, correct?

4 A. I printed out this whole thing and looked at it ad
5 nauseam.

6 Q. And it mentions whole one, right, with no prices,
7 correct?

8 A. Correct.

9 Q. I want to move on to something else.

10 Are you aware of what cross contamination is?

11 A. Of course.

12 Q. No one has talked about that. What is cross
13 contamination in drugs coming across the country or anything
14 like that? Scales, it's a whole bunch of issues. But what is
15 cross contamination in the drug world?

16 A. When different drugs are in the same vicinity, it can
17 become very easy for the drugs or residue of those drugs to
18 brush off on something else.

19 Q. Do drug dealers care about that?

20 A. They could care less.

21 Q. Right. They could care less.

22 So, for example, if in this case a truck driver threw
23 all kinds of drugs in a suitcase and came across the country
24 with that, what might happen with all that packaging?

25 A. They're going to touch each other.

1 Q. And what's going to happen?

2 A. There's going to be cross contamination. But it
3 doesn't stop there.

4 Q. I know.

5 A. It continues on with the police control of those
6 drugs.

7 Q. Right. And I'm not getting into. That is not my
8 issue.

9 So, for example, if a scale has residue and someone
10 has weed packaging or weed pounds in their house, is it likely
11 or unlikely it was cross contamination?

12 A. The best answer I can give you, it's possible. I
13 wouldn't say that it's likely or unlikely. I would say that
14 it's possible.

15 Q. So you cannot rule that out at all?

16 A. No.

17 Q. And you don't know the facts of this case about how
18 the drugs were brought across the country, correct?

19 A. Correct.

20 Q. But, certainly, if drugs were touching each other,
21 there's a high likelihood of cross contamination?

22 A. Of course.

23 Q. I don't know if you were here for this, but you heard
24 Agent Updegraff talk about how bales of weed come across the
25 country, correct?

LEFF - CROSS

1 A. I'm familiar with that, yes.

2 Q. And than that weed needs to be broken down if you're
3 going to have a high profit margin, correct?

4 A. Correct. The lower units that are actually sold, the
5 more money you make. If you sell it as a whole, you're going
6 to make substantially less money, which we talked about as
7 slipping.

8 Q. Right. So then it's not usual for someone selling
9 marijuana to have bags to package that up from the larger bag
10 and sell it, correct?

11 A. Correct.

12 Q. That's often done with a heat-sealer, correct?

13 A. Correct. A lot of my cases involve those FoodSaver
14 bags, which are the textured plastic that create -- and it's
15 heat-sealed at one end. Because for the most part, it stops
16 any manipulation of the items within during transport, and
17 secondly, it stops the possibility of air contamination coming
18 in, which makes it easier for the dogs to be able to smell.

19 Q. Let me ask you another question. You heard him talk
20 about meth, correct, Agent Updegraff, correct?

21 A. Yes.

22 Q. And he talked about it usually comes over in 1-pound
23 increments, correct?

24 A. That's right. it's somewhat strange. The rest of the
25 drugs are -- like he had said, cocaine powder, heroin. It's

1 through the metric system. Grams, kilos, versus the imperial
2 system that we use in America, ounces, and pounds, which is how
3 methamphetamine --

4 Q. You answered it.

5 And what he also spoke about and I want you to talk
6 about is that cocaine, when it's in its pure source, comes
7 wrapped, it's usually wrapped tightly in paper or black tape,
8 correct?

9 A. I've seen it many, many times. Not just wrapped
10 once, but in different types. There could be dryer sheets in
11 the middle of it. Grease, mustard, and maybe duct taped,
12 electrical tape, all kinds of things.

13 Q. And if someone were to purchase the pound of meth and
14 they were likely to make -- unless they're flipping it, they
15 would then want to break it down, correct?

16 A. That's correct.

17 Q. And is that normally done in a special type of
18 packaging? What's the packaging normally done to do that?

19 A. Depends on what unit you're trying to sell. If
20 you're selling it for a gram, it's going to probably be in an
21 Apple bag.

22 Q. If it was for, let's say 5-dollar bags or 10-dollar
23 bags, whatever it's going for, how would you break it down?

24 A. I'm personally not familiar with 5-dollar bags on the
25 East Coast for meth, but...

1 Q. What would a typical bag go? I don't know. I don't
2 buy meth. I honestly don't know.

3 A. Meth, the price has dropped dramatically within the
4 last couple of years. A gram of crystal meth, you can get it
5 60 to \$80.

6 Q. And then it's broken down, correct?

7 A. I'm sorry?

8 Q. It's broken down into those bags?

9 THE COURT: Mr. Leff, just answer the question,
10 please.

11 THE WITNESS: Yes, sir.

12 BY MR. ORTIZ:

13 Q. Then it's broken down into bags, smaller bags?

14 A. Yes. Much smaller units for greater profitability.

15 Q. Right. Because it's coming in that 1-pound bag, the
16 kilo shape, correct?

17 A. Correct.

18 Q. Already, correct?

19 A. That's correct.

20 Q. And then it's getting broken down, correct?

21 A. Correct.

22 MR. ORTIZ: I have no further questions.

23 THE COURT: Anyone else? All right. Cross-examine.

24 BY MR. STENGEL:

25 Q. Hello again, Mr. Leff.

1 A. Good afternoon.

2 THE COURT: Mr. Stengel, I'm going to limit your
3 cross to ten minutes. Is that okay?

4 MR. STENGEL: Sure, Your Honor.

5 - - -

6 CROSS-EXAMINATION

7 - - -

8 BY MR. STENGEL:

9 Q. Mr. Leff, you had referenced -- Mr. Hughes was asking
10 you a question about hard and soft. What is hard?

11 A. Hard is a very well-known term of crack-cocaine.

12 Q. What's soft?

13 A. Very well-known term of powder cocaine,
14 hydrochloride.

15 Q. So there are some things you agree with Special Agent
16 Updegraff on, right, and you said that?

17 A. I agree with probably most of what he said.

18 Q. What's a 62nd Street?

19 A. It's two and a quarter ounces. It's a 16th of a
20 kilo.

21 Q. Of cocaine?

22 A. Generally it's associated with cocaine, not with
23 methamphetamine.

24 Q. Sure. 62nd Street is cocaine or it's crack-cocaine,
25 right? We can agree on that?

1 A. Correct.

2 Q. Now, you had talked about reading -- reviewing a
3 whole bunch of wires as part of your work as an expert, right?
4 And we started to talk about this a little bit on voir dire,
5 that you have these individuals that you talk to, you have
6 addicts and you have users. But you also have clients?

7 A. I don't have any clients.

8 Q. But you're testifying in cases for -- and you've
9 testified 713 times. How many of those have been for the
10 defense?

11 A. All but once. I was called by a district attorney in
12 Philadelphia.

13 Q. For those 712 times you are paid by the defense,
14 correct?

15 A. Correct.

16 Q. And you are paid by the hour or the day?

17 A. Depends on who the attorney and who the hiring
18 authority is. Sometimes it will be by the United States
19 Government. Sometimes it will be by the City of Philadelphia.
20 Sometimes it will be by the private attorney. Sometimes it
21 will be by the public defender's office.

22 Q. And you are going to, at the end of this, submit a
23 bill, correct?

24 A. Correct.

25 Q. On that bill, how much time will it say that you

1 devoted to reading these texts and interpreting them?

2 A. I can give you an exact number if you like.

3 Q. Yeah. That would be great.

4 MR. HUGHES: Objection, Your Honor. I'm not sure
5 this is appropriate.

6 THE COURT: I'm not sure of this either.

7 BY MR. STENGEL:

8 Q. It's a matter of how much time did you spend
9 reviewing these text messages?

10 THE COURT: How much time have you spent in this
11 case?

12 THE WITNESS: Approximately, ballpark, 20 hours.

13 BY MR. STENGEL:

14 Q. How much time have you spent in this case since
15 Tuesday morning?

16 THE COURT: Well, today is Thursday. You mean the
17 last 48 hours?

18 BY MR. STENGEL:

19 Q. Right.

20 A. Since November 12, that figure I just provided.

21 Q. Twenty hours?

22 A. Correct.

23 Q. Eight or nine of it was sitting right there, correct?

24 A. I was here from quarter to nine to --

25 MR. MEEHAN: Meaning in the audience of the

1 courtroom.

2 THE WITNESS: Right. And --

3 THE COURT: The witness has been in court most of the
4 last two days.

5 MR. STENGEL: Right.

6 BY MR. STENGEL:

7 Q. And yesterday, was there any testimony related to
8 these text messages or coded language used by this drug
9 trafficking organization?

10 A. Well, it was pointed out by Special Agent Becker. He
11 had -- you had referenced some of the slides, but it wasn't
12 interpreted until today.

13 Q. So how much time -- so then you've spent -- out of
14 the 20 hours or so, you've spent a whole bunch of time sitting
15 here in the audience listening to testimony that had nothing to
16 do with the text messages. Then you were here -- is that
17 correct?

18 A. Yes.

19 Q. Then you were here for Special Agent Updegraff's
20 testimony today, correct?

21 A. Correct.

22 Q. And so how much time was left over to read and work
23 through what those texts might mean?

24 MR. HUGHES: Objection.

25 MR. ORTIZ: Objection.

1 THE COURT: Overruled.

2 THE WITNESS: Now that I've looked at the file, I've
3 spent seven hours reviewing those text messages.

4 BY MR. STENGEL:

5 Q. Reviewing those text messages, thank you.

6 And when you interpret a text message or a wire
7 transcript, what do you do? How do you figure out what the
8 code -- how do you break the code?

9 A. I look at it in its entirety based on the totality of
10 circumstances. I combine that with the physical evidence
11 that's hopefully recovered in conjunction with those texts or
12 wires to give it a sense of reality, or else it becomes what
13 really is subjective.

14 Q. So it depends on -- and you started to get into this
15 with Mr. Hughes. You hope that in relation to a particular
16 wire or particular text that there's actual drugs recovered,
17 right?

18 A. Sure. It makes it much easier.

19 Q. But that never happens with a wire, right? A wire is
20 several months, correct?

21 A. Or years.

22 Q. Or years. And then at the end of it -- except for
23 maybe some controlled buys. You get controlled buys during the
24 middle of that wire, correct?

25 A. Agreed.

1 Q. And then at the end, you have a large seizure,
2 correct?

3 A. Correct.

4 Q. And that large seizure will inform what the coded
5 language recorded over a course of months means, correct?

6 A. Yes.

7 Q. And you are aware that in this case, 10 kilograms of
8 cocaine were recovered at the end of the FBI's investigation,
9 correct?

10 A. Yes.

11 Q. And you're aware that 5 pounds of heat-sealed
12 methamphetamine, pure methamphetamine, was recovered in this
13 case, correct?

14 A. That's what I understand.

15 Q. And you're aware that on September 11, 2017, at a
16 trap house utilized by this group, that heroin was recovered,
17 correct?

18 MR. ORTIZ: Objection.

19 MR. HUGHES: Objection.

20 THE WITNESS: Well...

21 THE COURT: Are you aware of that or no?

22 THE WITNESS: I am aware of that.

23 BY MR. STENGEL:

24 Q. And you're aware that crack-cocaine was recovered,
25 correct?

1 A. Yes.

2 Q. Okay. Sir, if I could just show you what's been
3 marked as Government Exhibit 201C. This has been previously
4 admitted into evidence by the forensic chemist who conducted
5 this test.

6 MR. STENGEL: This is already in, your Honor.

7 Permission to publish?

8 THE COURT: Okay. Did we find the exhibit?

9 MR. STENGEL: 201C. It's okay. We can talk about
10 what it says.

11 THE COURT: Okay. Go ahead.

12 BY MR. STENGEL:

13 Q. The methamphetamine that was recovered on May 17,
14 2018, is a particular type of methamphetamine called
15 d-methamphetamine.

16 Do you know what d-methamphetamine is?

17 A. I'm familiar with that.

18 Q. Sure. You talked earlier about biker meth and
19 crystal meth, right?

20 A. There's D isomer and there's I isomer, different
21 purities.

22 Q. One is called D and one is called L?

23 A. Correct.

24 Q. If you have d-methamphetamine, which is what we have
25 in this case, and it's at least 80 percent pure, which we have

1 in this case, it's 98 percent pure, what is that
2 methamphetamine called?

3 A. Crystal.

4 Q. There's an actual industry legal term for it. It's
5 ice, right? D-methamphetamine 80 percent pure is called ice?

6 A. I would respectfully disagree with you. I don't
7 think that that would be a legal term.

8 MR. ORTIZ: Your Honor, we heard testimony on that.

9 It's a DEA term. It's in their manual. So he's asking -- I
10 object. He's asking him a question, he knows the answer, and
11 he answered correctly.

12 THE COURT: Overruled. Can you answer the question?

13 THE WITNESS: It's not a legal term. I disagree with
14 you.

15 BY MR. STENGEL:

16 Q. How familiar are you with federal statutes related to
17 narcotics classifications?

18 A. Well --

19 THE COURT: This is beyond the scope. He wasn't
20 asked about this on direct. I'm going to charge the jury on
21 what the statutes are.

22 What's the next question?

23 BY MR. STENGEL:

24 Q. We looked at some Google searches earlier. Did you
25 have anything to do with pulling those searches?

1 A. I did not.

2 Q. You were just shown an image, correct?

3 A. I just saw that for the first time on this screen. I
4 had not seen that before, that Google search.

5 Q. Okay.

6 A. But I already was aware of those strains.

7 Q. You're aware of those strains. So someone went
8 searching for those strains, correct?

9 A. Right. But I didn't know they were going to show me
10 a Google search of that strain.

11 Q. Sure. We talked about a zip is a quantity, correct?

12 A. Quantity or type of packaging.

13 Q. And the quantity is an ounce, correct?

14 A. Can be.

15 Q. What else can it be?

16 A. It can be a smaller amount that's contained within a
17 zip. Police routinely put ZLP, zip-lock packet.

18 Q. ZLP doesn't spell zip. It spells ZLP.

19 A. Z slash L slash P. It's through-and-through
20 Philadelphia discovery narcotics reports. It's well-known that
21 zip --

22 Q. Did you see it any of the discovery that you reviewed
23 in this case?

24 MR. GOLDMAN: Can he finish his answers?

25 MR. ORTIZ: Yeah. Let him finish.

1 MR. STENGEL: Please.

2 THE WITNESS: It's well-known in -- and I get 20 new
3 cases a week just from Philadelphia. I'm very familiar with
4 the language that is used by law enforcement in Philadelphia
5 and how it's referred to, what kind of packaging, and the use
6 of the word zip.

7 BY MR. STENGEL:

8 Q. You mentioned earlier -- Mr. Ortiz was asking you
9 about cross contamination on a scale, correct?

10 A. Yes.

11 Q. And if say, for example, there's two substances on a
12 scale. By way of your opinion, you can't tell which one of
13 those substances was actually on the scale being weighed,
14 correct?

15 A. (No response.)

16 Q. For example, say you have cocaine and methamphetamine
17 residue on a scale.

18 A. Okay.

19 Q. You can't say for certainty that methamphetamine was
20 on that scale or cocaine was on that scale, correct?

21 A. That it may have been.

22 Q. But it had to be one of them, right?

23 A. Well, it certainly was on that scale at one time by
24 virtue of whatever drug combination, by virtue of whether it
25 was cross contamination, or by virtue of people actually

1 weighing it out.

2 Q. So for cross contamination to happen -- and correct
3 me if I'm wrong here. For cross contamination to happen,
4 you're talking that one substance picks up residue of another
5 substance while it's traveling across the country, right?

6 A. Or the person that's creating it -- this is not done
7 under sterile laboratory environment. They really don't care.

8 Q. So if there's cocaine and methamphetamine on a scale,
9 it's got to be one of them, right?

10 A. If it was used to weigh those substances, yes.

11 THE COURT: Any redirect?

12 MR. GOLDMAN: I have one.

13 - - -

14 CROSS-EXAMINATION

15 - - -

16 BY MR. GOLDMAN:

17 Q. You were aware -- this was left out. You were aware
18 also that lots of pounds of marijuana were found at locations
19 associated with these defendants?

20 A. I am aware of that, yes.

21 MR. GOLDMAN: Thank you.

22 MR. STENGEL: One more question, Your Honor.

23 THE COURT: Wait. Redirect. Go ahead.

24 - - -

25 REDIRECT EXAMINATION

1 - - -

2 BY MR. HUGHES:

3 Q. Mr. Leff, in addition to the exhibit Mr. Stengel was
4 asking you about which is USA 3004, you did review those
5 messages, correct?

6 A. Yes.

7 Q. You were provided the entirety of the discovery in
8 this case, correct?

9 A. That's correct.

10 Q. And you spent hours discussing this matter with
11 counsel here, correct?

12 A. Correct.

13 Q. Who guided you through the discovery, right?

14 A. Correct.

15 MR. HUGHES: Thank you no further questions.

16 THE COURT: Recross.

17 - - -

18 RECROSS EXAMINATION

19 - - -

20 BY MR. STENGEL:

21 Q. You've been provided all of the discovery in this
22 case?

23 A. Correct.

24 Q. And you've been provided all of the text messages in
25 this case?

1 A. Correct.

2 Q. And you read it all in the seven hours that you were

3 --

4 THE COURT: He didn't say that. He read it before he
5 came in.

6 MR. HUGHES: Objection.

7 THE COURT: Is that correct?

8 THE WITNESS: Yes, sir.

9 THE COURT: That's all. The witness is excused.

10 (Witness excused.)

11 THE COURT: Are there any more defense witnesses?

12 MR. HUGHES: No, Your Honor.

13 THE COURT: Any rebuttal from the Government?

14 MR. WITHERELL: No, Your Honor, no rebuttal.

15 THE COURT: Ladies and gentlemen, that concludes the
16 testimony of the case. The next step are oral arguments. Now,
17 here is what I think we're going to do, and I'll talk to
18 counsel about this. Obviously, we can't finish the case today.
19 I'm now going to direct Government counsel to give their
20 opening address.

21 The Government gets -- because the Government has the
22 burden of proof under our procedures, the attorneys for the
23 Government get both an opening and a closing. So the opening
24 will take place now. If any member of the jury needs a break,
25 we can do it.

Otherwise, Mr. Witherell, how long do you want to save for rebuttal?

MR. WITHERELL: I want so save half an hour, Your Honor.

THE COURT: So how long do you want for your opening?
You'll open a half hour then or do you want a little longer?

MR. WITHERELL: Maybe a little longer, Your Honor.

THE COURT: Well, it's now 2:40.

MR. WITHERELL: I believe we need the charging conference prior to closing.

THE COURT: I want to do your opening, and then we can have any legal discussions. Then the defense will go on Monday morning.

MR. HUGHES: Your Honor, I do have some exhibits to move into the record.

THE COURT: Yeah, you'll do that.

MR. WITHERELL: Judge, can we approach quickly.

(Sidebar discussion as follows:)

MR. WITHERELL: I think we need to have one, Judge.

THE COURT: You're right. I intended to say that, after your opening, this is the charge conference, but I've said for the last three days that I think the Government's points for charge are entirely correct. They're consistent with the Third Circuit model instructions.

1 The only issue remaining -- and defendants have not
2 submitted any points for charge. I read off my proposed
3 instruction about the rap music, and I intend to give that. I
4 haven't heard any suggestions or criticisms, but I will accept
5 those on Monday.

6 We have an issue about the verdict form, but I don't
7 think you need to know -- I'm pretty sure I'm going to stick
8 with what I think is right, but I don't think that impacts your
9 opening.

10 MR. HUGHES: Your Honor, on behalf of Mr. Blanding,
11 we did have some objection to some of the modified language
12 that was submitted by the Government on some of the charges.

13 THE COURT: Okay. We can go over that on Monday.
14 Okay. So, look, you said you wanted an hour total for closing,
15 but if you want to save a half hour for your rebuttal, it's
16 2:45. I want to have your opening now, and then we'll adjourn.

17 Mr. Goldman, what did you want to put on the record?

18 MR. GOLDMAN: Your Honor, I move for a mistrial. I
19 believe that the Court hampered my proper defense.

20 THE COURT: Denied.

21 Mr. Witherell, how long do you want for your opening
22 right now?

23 MR. WITHERELL: I think 45 minutes would be enough
24 time.

25 THE COURT: Okay. That's what we're going to do.

MR. WITHERELL: Can I have a moment to set up a
PowerPoint or do you want to go right into?

(End of sidebar discussion.)

THE COURT: Ladies and gentlemen, we're going to go ahead, as I said, with the Government's opening address right now, and Mr. Witherell needs about five minutes to get his exhibits straightened out. I'm going to ask you to retire to the jury room for just five minutes, if you don't mind, and we'll come back and proceed. Thank you.

(The jury exits the courtroom at 2:45 p.m.)

THE COURT: I have what defense counsel requested for their arguments. I'm going to stick with that, what we discussed. Mr. Meehan, you asked for 20 minutes, and the others asked for -- well, Mr. Ortiz and Mr. Hughes asked for 40. Goldman wanted more.

MR. MEEHAN: He always wants more, Judge.

THE COURT: And then Mr. Witherell will have 30 minutes for rebuttal. Then we may -- we'll have lunch brought in. Whether I charge the jury right then or have a lunch break, we'll wait and see. Thank you.

(Recess taken from 2:46 p.m. to 2:55 p.m.)

(The jury enters the courtroom at 2:55 p.m.)

THE COURT: Okay. Ladies and gentlemen, I know it wasn't five minutes. We actually had a computer problem that

1 delayed you coming back here, but it's been resolved.

2 And just one further word about closing arguments.

3 You may recall, when the trial first started last week, I told
4 you that an opening argument was really just an opportunity for
5 each attorney to give you, like, a road map or introduction.

6 Closing arguments, to the contrary, are the
7 opportunity for the attorneys to argue to you, based on both
8 the facts and the law, to show you through what has taken place
9 in the courtroom warrants returning a verdict in favor of their
10 client. Mr. Witherell, obviously, for the Government. The
11 defense counsels, obviously, for the defendant.

12 So pay close attention to the closing arguments. We
13 will have the defense lawyers give their arguments Monday
14 morning, and then the Government will give a rebuttal argument.
15 And then I will charge the jury. Once again we'll order lunch
16 to be brought in for you so you don't have to go out. And then
17 when I finish the charge, that's when you begin your
18 deliberation.

19 So we're getting close, but still I must ask you not
20 to form any fixed opinions, not to talk about the case with
21 each other, and to just listen carefully. You're welcome to
22 make notes as the arguments proceed, and when this is done,
23 then we'll adjourn for the long weekend and resume on Monday
24 morning. You've been very attentive and very closely watching,
25 and we thank you all for that.

1 Mr. Witherell, please proceed.

2 MR. WITHERELL: Thank you, Your Honor.

3 THE COURT: This will be 45 minutes I'm told, and
4 then we'll adjourn. Thank you.

5 MR. WITHERELL: 3:30 I thought we had to leave by,
6 correct? For Your Honor, I thought we had to be done by 3:30?

7 THE COURT: You can use the computer.

8 MR. WITHERELL: No. I'll be okay, Judge.

9 THE COURT: All right.

10 MR. WITHERELL: This isn't an indictment against rap
11 music. The FBI wasn't trolling social media pages looking for
12 OBH Records or Bionickhaz Entertainment and decided that they
13 were going to open up an investigation. Far from it.

14 You know how this investigation started. Special
15 Agent Task Force Officer Gregory Stevens told you. It was an
16 uptick in crime and violence and drugs on the 2000 block of
17 Bridge Street, and long before Donte Stewart was a cooperating
18 witness for the Government, he was a target of a joint Federal
19 Bureau of Investigation and Philadelphia Police Department
20 investigation.

21 They wanted to know where his source of supply was,
22 who he and other drug dealers on that block were getting their
23 product from, so they bought in higher and higher amounts in
24 hopes that he would lead them to the leaders of those
25 organizations. And he did. He led them to the Mansion that we

1 heard so much about. He led them to him.

2 So the FBI puts up a pole cam, and utilizing every
3 tool at their disposal, they start identifying members who went
4 in and out of the Mansion, in and out of that house: Amir
5 Boyer, Mullaz; Daryl Baker, Shaddi; Hans Gadson, No Brakes
6 Bras; Jameel Hickson, OG or Melliano; Jamaal Blanding, Khazi.
7 And of course Abdul West. It's his trap house, after all. He
8 tells you that.

9 The FBI investigation doesn't stop there. They
10 systematically go through each and every one of these
11 defendants. They download over 60 phones and a MacBook in this
12 case. They get search warrants, pen registers, ping orders,
13 you heard all about them, electronically monitoring each --
14 many of the defendants. They get search warrants for Instagram
15 accounts, verifying that cell phones belong to certain
16 defendants. We spent a great deal of time speaking about that
17 through the course of this trial. We heard names like
18 Ar_Ab_32, No Brakes Bras, Bionickhaz, their Instagram accounts
19 that they start to look at, review, analyze, determine who
20 these players are.

21 And then there are the cell phones. Because while
22 those social media accounts that we've seen so many of, and
23 I'll try not to go through too many of them, were public
24 accounts, none of these defendants had any idea two years later
25 you would get to see their private, personal text messages

1 between them.

2 And we saw social media post after social media post,
3 defendant after defendant after co-conspirator, all in and
4 around the Mansion. We saw text message after text message.
5 They talked to each other about what they're doing, where they
6 are. They have tally sheets of drug counts. They openly talk
7 about the count. Text message after text message going to
8 Mr. Abdul West, a 62nd Street, a 14th Street, go to Bras, go to
9 Shaddi. It all gets run through him.

10 And one thing becomes perfectly clear to
11 investigators, that these aren't just an unconnected group of
12 people who happen to be selling drugs out of the same trap
13 house on Sydenham Street. They are a group of people working
14 together with a common purpose, with a common plan. They have
15 the same goal. Get drugs and sell them. That's what they do.
16 And they're relentless about it.

17 Remember, that pole camera that was up on Sydenham
18 Street, it wasn't up very long. After it's up for a little
19 while, an unrelated incident brings the Philadelphia Police
20 Department to that location on that specific date. That's a
21 snapshot in time. It's one day out of this entire conspiracy.

22 And what do they find when they go into that house?
23 229 grams of heroin, 48 grams of methamphetamine, over 62 grams
24 of crack-cocaine. And that's in the house, not to mention
25 what's found outside in those two cars. There's the white Jeep

1 registered to Abdul West. There's the Chevy Impala registered
2 to Abdul West.

3 You saw pole camera video where agents identified
4 each of the individuals, and you see Daryl Baker,
5 co-conspirator Daryl Baker. He comes with a plastic bag. I
6 won't go through it again. He goes into that Impala, and then
7 he leaves. And the plastic bag is nowhere to be found until
8 many months later when the FBI does a search warrant, and
9 another 169 grams of crack-cocaine, over 300 grams of cocaine
10 found in that Chevy Impala, this gun found in the trap of that
11 white Jeep registered to Abdul West. This gun found underneath
12 that rug in the Mansion.

13 We heard a lot about the Mansion. I'm not going to
14 go through all the text messages. And by the way, you can have
15 those when you go back and deliberate. You can ask to see
16 specific text messages, all the text messages. Make sure you
17 do that. I just want to go through a few with you. We know
18 it's his trap house. He tells you that. Time and time again,
19 social media post after social media post, defendant after
20 defendant, in, around that house.

21 Just about a little over a week before September 11,
22 before that snapshot in time, it's Abdul West telling Dennis
23 Harmon evacuate the Mansion. There's too many police in the
24 area. You guys remember Dennis Harmon, of course. He's the
25 guy that's there on September 11, the one who gets arrested,

1 the one whose job it was to stay and say it's his place, that
2 no one else lives there, even though each and every one of you
3 has seen social media post after social media post of people
4 inside that house, these people inside that house.

5 Jamaal Blanding, about a week before the Mansion gets
6 hit, telling people he's going to be at that Mansion. Bras is
7 going to be there with him. The day before, Hans Gadson
8 talking about putting something together, going to pick it up
9 at the Mansion. This is their stash house. It's where they
10 keep their drugs. Abdul West texting Jamaal Blanding, very
11 specific about where things are hidden, where you can find
12 things. They know where all the drugs in that house are
13 because it's their stash house.

14 And then the Mansion gets hit. Philadelphia Police
15 Department, they enter the place. They find the drugs we
16 talked about. And Jamal Blanding, panic ensues. Do we have
17 eyes on the Mansion? Yes. Did they go in? I believe so.
18 Door still open.

19 I'm sorry you can't see it. You can ask for it when
20 you get in there.

21 This is Abdul West, Jamaal Blanding, Amir Boyer,
22 talking about police raiding that house. What did they take?
23 They talk about Boog going in. That's Richard Chase Hoover.
24 That after the search of the Mansion, he goes in to see if
25 they've taken everything, if they hit the super safe, is what

1 they say in that text.

2 And then you saw the pole camera video where Amir
3 Boyer and Richard Chase Hoover arrive the next day in a car.
4 They go in. Richard Chase Hoover comes out with bags. They
5 put it in the back seat of that trunk and they take off.

6 And even though Philadelphia police took the
7 narcotics found in that place, they didn't stop, and you know
8 why. This is that text message with Abdul West and that guy
9 that we've identified as Poe, right? The guy who proclaims to
10 be a manager of OBH Records. But when you look at the text
11 messages, they're not talking about music. This is their
12 source of supply. Abdul West is saying, we've lost this. I'm
13 sorry. He even talks about quitting. He's not talking about
14 quitting the music game. He's talking about quitting the drug
15 game. This is right a week after -- less than a week after the
16 Mansion is hit.

17 And then this text message, which we heard a little
18 about because September 27 up top is actually wrong. Agent
19 Becker told you the date is incorrect. But this is a
20 continuation of that conversation. Poe saying he's telling
21 Chino, his source of supply, that things are slow for you, that
22 we'll figure this out. There's got to be a way that you can
23 make this up. Let me know about that other situation that you
24 have going on. And you all know what the other situation is
25 because you've heard evidence upon evidence of the trips to

1 California.

2 Think about this in terms of the investigation.
3 Their stash house has been hit. It's no longer being used.
4 The FBI, utilizing all tools at their disposal, they start
5 looking at who they're talking to. And what they find out is
6 that Abdul West is spending a lot of time talking to Richard
7 Chase Hoover. We've talked about him a lot throughout the
8 course of this trial. He's the truck driver.

9 Electronic monitoring starts, and they notice that
10 Richard Chase Hoover, he's spending a lot of time going to the
11 West Coast. I wonder who he's going with? And lo and behold,
12 every time, you know exactly who he's going with: Jameel
13 Hickson and Jamaal Blanding. Every time. Hoover travels days,
14 three, four, five days by truck to California where he's met
15 either the same day or a day after by these two people. He
16 spends three, four days most in these locations, and he's
17 automatically on his way back. He always leaves first.

18 If these are three friends just going to California
19 because they enjoy long weekends together, do you think Hoover
20 would fly just once? But you know he can't because it's the
21 truck that's important, not Hoover. It's his truck that they
22 need.

23 And when they get to California, they're there for a
24 few days most, and they're always talking to each other, right?
25 We pulled up the CAST report. They're always around the same

1 area. We know that they're very concerned talking back to each
2 other, not just about eating chicken wings or going to
3 Friday's, but about the truck. Hoover texts them, the truck
4 will be ready to go on Wednesday. They're really concerned
5 about that truck.

6 And after a long time in California between three
7 friends who fly and poor Hoover's got to drive that whole way,
8 what's the first thing that he does when he gets back to
9 Philadelphia, after a four-, five-, six-day trip across the
10 country? The first thing he does is go see one of them. He
11 stops nowhere else. Four-, five-day trip.

12 First trip, first place he goes, 1 Brown Street.
13 Then Race Street, then Race Street, then Race Street, then Race
14 Street. He's either met by one of the defendants or picked up
15 at that truck spot that we saw so much surveillance about by
16 Abdul West and Jamaal Blanding.

17 It's so important that on May 3, this is before the
18 last trip, Hoover's making sure, have you dubbed the keys for
19 me yet. If you don't get it today, make sure and bring a key
20 out with you so I can go straight in once I get back. What is
21 so important that he has to make sure he gets right in?

22 Defense attorneys have brought up, through
23 cross-examination, that you can't know what's in that bag, but
24 that's not true. Just because we're in a courtroom doesn't
25 mean you leave your common sense at the door. You know exactly

1 what's in that bag, what's in all those bags. You've seen
2 video after video. It's almost comical when Richard Chase
3 Hoover is pulling, dragging bags into houses, and nobody helps
4 him. No one lifts a finger to help him but for Jamaal Blanding
5 when he opens the door to the Water Street apartment on the
6 last trip. Because they don't care about Richard Chase Hoover.
7 They care about the bags.

8 We heard a lot of recorded calls throughout the
9 course of this trial. They're hard to listen to. I think it
10 was a Friday afternoon, and it's tough. You're allowed to ask
11 for those back, and I hope you do. There's just a couple that
12 I want to briefly go through with you.

13 The first one I played, it's 2017. I'm not going to
14 play it for you. It's Daryl Baker, and he's calling Jamaal
15 Blanding. And Jamaal Blanding is in California. It's during
16 trip one. Blanding says, I'm on the other side. Daryl Baker
17 immediately knows that to mean California, and the first thing
18 out of Daryl Baker's mouth is, where's Melliano? Where's Boog?
19 Jamaal Blanding doesn't say that he's with those people, but
20 Daryl Baker knows it. And the reason he knows it is because
21 that's the plan. That's what's supposed to happen. These
22 three go, the truck comes with them, they get the narcotics,
23 and they ship it back.

24 You know what's in that bag because they tell you
25 what's in that bag. Text message from Abdul West, I think it

1 was from Sheen. It's one of the many text messages we've seen,
2 and Abdul West says, I'm out. I'm back up on Tuesday. I'm
3 going to have more narcotics on Tuesday. And it just so
4 happens that that's when Richard Chase Hoover is supposed to
5 show up. That's the plan and it all runs through Mr. West.

6 Now, these two, Mr. Hoover, that was their part,
7 right? That's what they had to do. But everyone's got a role
8 to play. Mr. West told you that. I've given you all different
9 hustles. That's the text message, right? Don't go over my
10 head to Mr. Hickson when you need one of our items. When you
11 need one of the narcotics I let you run, you need something
12 else, come through me. I'll get it for you. You're not
13 allowed to do it by yourself. He's the boss.

14 And everyone has their different hustles. You know
15 what Mr. Gadson's hustle is. He's a sales guy. Crack-cocaine,
16 cocaine, that's what he's selling. The defense expert that you
17 just heard agrees with the Government's expert, Special Agent
18 Updegraff. That's what a 62nd Street is. It's not marijuana.
19 No one calls marijuana a 62nd Street, not Special Agent
20 Updegraff of the DEA, not their own experts. He sells
21 crack-cocaine for Abdul West. Text message after text message
22 after text message. From now on, every hardware play I make,
23 I'm a shoot the count. That's what he does. That's what a
24 good salesman does. Every so often, makes a sale, shoots Abdul
25 West the count. Here you go, boss, this is the drugs we have

1 on hand, this is the money we have on hand. That's his hustle.

2 But that doesn't mean he's not aware of the drugs
3 found at the Water Street apartment. He tells you about it in
4 his video statement, that he knows exactly that that apartment
5 was hit. The day it's hit, he's on his Instagram account
6 telling people, the day Water Street is hit, he's telling
7 people stay low. Those people are on to us.

8 Just because his hustle was crack-cocaine doesn't
9 mean those drugs, the 10 kilos of cocaine, the multiple pounds
10 of methamphetamine, aren't directly attributable to him. Of
11 course they are. He's got his part to play in the conspiracy.
12 He's very adamant during that videotaped statement. Meth, I
13 know nothing about meth. What are you talking about, meth?
14 Meth who? But when he wants methamphetamine, he knows exactly
15 who he needs to talk to. Jamaal Blanding.

16 Because you saw text message after text message of
17 Jamaal Blanding, and you know what his hustle was. He's the
18 meth dealer. His hustle, given to him by Abdul West, is to
19 sell methamphetamine. That's his job. Of course, part of his
20 job is also going across the country to acquire the cocaine
21 that they cook into crack and the methamphetamine that they
22 sell.

23 This is a text message from Jamaal Blanding to
24 32nd Street Youngins. What's homie? Huh? Who's this? What's
25 up, homie? Lost my contacts. Remember ab sent me to you. I

1 had grab the ice couple times. And they're talking about
2 methamphetamine.

3 Now, the Mansion gets hit on September 11, 2017, and
4 they need a new stash house. They've already burned their
5 supplier, Poe and Chino, and so they need a new move, they need
6 a new source, and they need a new stash house. And the first
7 one goes to 1 Brown Street, and Mr. Ortiz very clearly
8 indicated on many occasions that Mr. Hickson lives in a very
9 nice apartment. It's not like a Mansion. So that's not a
10 place where you can keep kilograms of cocaine, pounds of
11 methamphetamine. Even though methamphetamine and crack were
12 found on a scale, that's not where they're keeping it. So they
13 need a new stash house.

14 So here comes Race Street. You heard a lot of
15 testimony concerning Race Street. But when you have a drug
16 house, you don't rent it in your own name. We heard about
17 that. We heard about the Tabitha Bishop, how the ID on that
18 lease, that Tabitha Bishop doesn't exist. And then you met
19 another Tabitha Bishop, Mr. Jamaal Blanding. Text the name to
20 me. Tabitha Bishop. Sign her name on back of each one also.
21 This is two days before those money orders that were moved into
22 evidence for the Race Street apartment were signed by Tabitha
23 Bishop. But we know what happened on Race Street, right?
24 There are four trips there, and they're getting kicked out
25 because they haven't made the rent. So now we need a new

1 place.

2 Abdul West, Jamaal Blanding, Richard Chase Hoover,
3 talking about the Water Street apartments. They'll be ready
4 next week. Just got to put 13,000 in his account. Then give
5 him the rest when we get in. In whose account? OG folks.
6 There is no connotation where OG means marijuana in that
7 particular text message, and it never means marijuana in this
8 group. You know exactly who OG is. Mr. Jameel Hickson.

9 57500. Huh? Apartment. Is that the unit we're in?
10 Yo, you find out where we got to pay the move-in money to? We
11 waiting. Okay. Waiting on a homie to call OG. Jameel
12 Hickson. He's the one that's going to help them get the Water
13 Street apartment. He's going to aid them to get that house,
14 that apartment that they're going to use to stash drugs.

15 But we're not going to do it in our name. Just like
16 Race Street. We're not going to put our name. It's not leased
17 under OBH Records. It's not leased under Bionickhaz
18 Entertainment. It's leased under DeAngelo Smith. And here you
19 have Jamaal Blanding sending his height and weight to Big Man
20 Cali. And what does he get in return? Got it late last night.
21 On the way now. Tomorrow? Yes. Appreciate it. Okay. Meet
22 DeAngelo Smith.

23 But like everything in this case, he didn't do this
24 on his own. He was helped. Jameel Hickson, right before he
25 sends that first text message, Big Man, call him now to get

1 price. Jameel Hickson is telling Jamal Blanding what he needs
2 to do to get that fake ID so that they can continue to operate
3 out of the Water Street Apartments because their plan is not
4 for the FBI to search them on May 17, 2018, but to continue to
5 use that place.

6 You saw so many social media posts. This one, boss
7 talk amongst bosses. It's between Abdul West and OG. And the
8 reason this one I think is important is what had happened.
9 This is right after the Mansion gets hit and right after trip
10 one. It's taken right outside Brown Street. It's where Jameel
11 Hickson lives. They've got new investments, new opportunities.
12 They found a new source. They're looking for new stash houses.
13 This is between Abdul West and Jamaal Blanding, and they're
14 talking about the narcotics that they have on hand. And during
15 one of them, they talk about the OG load. The OG load.
16 They're talking about narcotics that this man has procured for
17 the organization.

18 And no matter how many times they want to make this
19 case about marijuana, you know that it's not about marijuana.
20 Because that's what's found at the Mansion. This wasn't how
21 the cops put it in. This is how it was found, marked OG. And
22 that's not marijuana. It's 229 grams of heroin. Those drugs
23 at that Mansion, it's all of theirs. His too.

24 This is during trip four telling Mullaz and Abdul
25 West there's a lot of money to be made out here. Get your

1 weight up. He's in California. You don't need Randy Updegraff
2 to tell you what he's talking about.

3 May 16, 2018, the day before the hit at Water Street.
4 Hoover is driving back. Blanding and Hickson were just with
5 him in California. They just saw him. And on his way back,
6 Jamaal Blanding texts him. Call OG. He's here with me. It's
7 the day before he gets back. There's something really
8 important that guy's carrying.

9 This is Jameel Hickson and Jamaal Blanding, and we
10 talked about GMT. This is before the hit. It's late at night,
11 but it's before the FBI searches that. And what are they
12 talking about? Yo, bull, what up? I'm at the crib. You gonna
13 meet me early or should I see Boog down the way? You want to
14 meet tonight? Nah, early. They just saw him, but they have a
15 real important reason to see him now. And you heard they
16 didn't go see him, the text message. They decided they were
17 going to go the next morning.

18 But the FBI's situated. They're ready. Boog goes to
19 One Water. They execute the search warrant. 10 kilograms of
20 cocaine, pounds of pure methamphetamine are recovered, and then
21 panic hits. This is around 5:00 in the morning. Jamaal
22 Blanding is calling who when he finds out that Boog isn't where
23 he's supposed to be, that the drugs are gone? Calls Hickson.
24 Calls him twice. Then they got to call the boss, call Abdul
25 West.

1 Text message from Hickson. I know, right. My boy
2 called me with some bullshit. My folks got snatched this a.m.
3 with money. He knows exactly what Boog was carrying. It's
4 his. And he's not just talking about that \$20,000 that was
5 heat-sealed. You know that because he claims to have lost a
6 lot more. If I'm losing 120K, it's karma for getting ready to
7 marry my ex-sister. He's talking about the product, his cut,
8 what he's going to lose. They did this together.

9 Jameel Hickson texts Abdul West: I know it's a bad
10 time for us, but we're going to get through this shit, my boy.
11 We didn't hear any bad times for OBH Records then. Nothing bad
12 happened but the seizure at One Water Street. Think positive,
13 bro. I'm trying. I know, bro. It's a bad time for the group.
14 Not OBH Records but this drug trafficking organization, and it
15 all runs through Abdul West.

16 We saw time and time again, text message after text
17 message, people going to West, I need a 62nd Street, I need a
18 14th Street, and he sends them out. Get it from Bras. Here's
19 Shaddi's number, give him a call. You heard those recorded
20 phone conversations where Daryl Baker and Abdul West are
21 discussing OBH. They're talking about the involvement, what
22 people have to do. They mentioned Mullaz and No Brakes Bras,
23 how they always have to go on the street. They can't hang with
24 us because they always have to be moving. They're the street
25 guys. They're the salesmen.

1 And you heard from Dontez Stewart. Dontez Stewart is
2 a murderer. You shouldn't like him. But when you think about
3 his testimony, I want you to ask yourself, what did he tell you
4 that isn't corroborated by all the other evidence in this case?
5 That he's a member of OBH? He's got it tattooed on his neck.
6 He's not a rapper or a record producer. He's got two jobs. He
7 told you what they were. He sells crack-cocaine for that man
8 and he has to be on call.

9 He told you about all the times he sold crack-cocaine
10 for Abdul West, and when Abdul West wasn't around, he was told
11 to go to Hans Gadson, who you know from all the text messages
12 sells crack-cocaine. What did he tell you that you don't know
13 to be true?

14 Before he was a cooperating witness, he was a target,
15 and you heard the controlled buys. On June 22, he tells a
16 confidential source, I'm going to the studio to get you that
17 crack-cocaine. He's followed by FBI agents to Mr. West, who's
18 at the studio. That's what Dontez Stewart told you. That's
19 what FBI agents told you. That's what the cell sites tell you
20 and then being at the same location.

21 You have the August 17 buy where, after he goes to
22 the Mansion where Abdul West is seen, too, where their cell
23 phones both are and he comes back, he says to the confidential
24 source, this is from Ab. It's on the recording. You can ask
25 to listen to it.

1 THE COURT: Mr. Witherell, five more minutes. Thank
2 you.

3 MR. WITHERELL: What else does he tell you? He tells
4 you that on October 14, October 13, he gets a call from Abdul
5 West. He's supposed to meet him and he goes. We showed you
6 some cell sites. You can see Donte Stewart's phone is
7 traveling to the direction of Abdul West before this message,
8 before this message from Donte Stewart: Yo, Rob, this is Taz.
9 Hit me kin.

10 On that same night, Jamaal Blanding's telling Abdul
11 West where Robbie is. Remember Donte Stewart said Robbie said
12 he was at Vanity? And here you have Jamaal Blanding telling
13 Abdul West, are you still out? No. Robbie, he's here. He's
14 at Vanity.

15 And whether or not -- then you heard about that
16 conversation that Donte Stewart had with Abdul West, where he
17 was ordered by the leader of his drug trafficking organization
18 to murder Robert Johnson. He says yes and he does it. You're
19 not going to hear a charge about murder in this indictment, but
20 what it shows you is that he's in charge of this conspiracy.
21 Things get run through by him. If Donte Stewart doesn't
22 listen, maybe he gets taken care of. Maybe he doesn't get
23 anymore crack-cocaine from him. Because he's in charge of his
24 organization.

25 And either, either he's the most unluckiest musician

1 that's ever existed or he ordered that hit. Because four days,
2 four days after Robbie Johnson's killed, this is what's in his
3 phone: I call Tez and tell him to take his head.

4 Members of the jury, the evidence in this case is
5 overwhelming. There is no doubt that these men sitting before
6 you and the other people conspired to get drugs and sell it.
7 They helped each other do it. They had different roles with
8 one goal. They are guilty of the charges against them in the
9 indictment. And I thank you very much for your time.

10 Thank you, Your Honor.

11 THE COURT: Okay. Ladies and gentlemen, that
12 completes the Government's opening. We're going to adjourn for
13 the day and for the weekend. Please remember to keep an open
14 mind. I doubt you'll read anything about this case, but if by
15 any chance it appears in any newspaper, radio, or anything like
16 that, please ignore it because you must confine your
17 deliberations to what took place in this courtroom.

18 So have a very good weekend and please be here at
19 9:00 a.m. Monday morning. As I said, lunch will be ordered
20 again for you so we can go straight through, complete the
21 arguments, and then have the jury charge. Thank you very much.
22 Jury is excused.

23 Everyone remain seated while the jury leaves the
24 room.

25 (The jury exits the courtroom at 3:38 p.m.)

1 THE COURT: Let's stay on the record. We're going to
2 wait a few minutes before anybody leaves. This discussion
3 relates to the jury verdict form.

4 Now, let me summarize where I am here. I've read the
5 US versus Alleyne case, 133 Supreme Court 2150. That case
6 involved brandishing a firearm, and it reversed an earlier
7 decision by the Supreme Court called the Harris case. It
8 stated in there that because the mandatory minimum had been
9 increased that, therefore, the jury verdict -- the jury was
10 entitled to determine -- was required to determine as a fact
11 whether the facts showed brandishing. The mandatory minimum
12 was increased only for brandishing, not just for possession, as
13 I read the case.

14 However, that case was a decision by four justices.
15 It is not a majority opinion. Justice Breyer concurred in the
16 result and made some passing comments, but Justice Breyer has
17 continued consistently with his view of Apprendi in which
18 sentencing considerations should be for the judge only and the
19 jury shouldn't be considered. He dissented in Apprendi. He
20 has continued to dissent in future cases.

21 Now, in all actual honesty, I want to tell you that
22 the DC circuit came out with an opinion reported at 892 F.3d
23 1203, which I also read, and in that case, the DC circuit, on
24 facts very different from this case, but it was a drug case,
25 apply Alleyne to a charge of conspiracy and said that, because

1 the district court had failed to find individualized
2 involvement with the drugs, that, as I recall, there's going to
3 have to be a new trial on that issue, although there was an
4 issue as to whether just the sentencing had to be redone and
5 not necessarily a new trial granted.

6 Since then, there has been no Third Circuit
7 precedential case on this issue, and US v. Phillips, that I
8 cited this morning, remains good law. There have been some
9 non-precedential opinions, but none of them have adopted what
10 counsel in this case think I must do.

11 Now, I want to point out for Counts 6 and 12, which
12 are possession counts, multi-defendant possession counts, my
13 proposed verdict form does have specific individual defendant
14 finding, but I am not going to do that for Count 1, the
15 conspiracy. Because in my view, to require individualized
16 findings on weight or quantity in a conspiracy count just goes
17 counter to the whole concept of conspiracy that I have to
18 charge the jury, that if the Government has proven to the
19 satisfaction of the jury that each defendant or any one or more
20 defendants were co-conspirators, that is, that they were
21 participating in the conspiracy in furtherance and during the
22 period of a conspiracy, one act is the act of all.

23 And I think that that principle of law, which has
24 been ingrained in US jurisprudence for decades, if not longer,
25 is totally inconsistent with requiring the jury to find

1 specific quantities for an individual defendant if the jury has
2 found that they are co-conspirators.

3 So the verdict form that I propose first has a
4 finding as to each defendant, whether or not the jury is
5 convinced beyond a reasonable doubt that they are guilty of
6 conspiracy. And if so, then I think the quantity issues don't
7 have to be brought out for each defendant because the
8 interrogatory says it's only for those defendants as to whom
9 the jury has found are co-conspirators.

10 That's my holding at the moment. If anybody comes up
11 with contrary precedent, I will consider it Monday morning.

12 MR. WITHERELL: Judge, I would ask for that time. I
13 think that I would like to present something.

14 THE COURT: I am aware that all of you disagree with
15 me, but I think I'm on sound legal footing in my decision as of
16 this time.

17 MR. STENGEL: Your Honor, you had mentioned the US v.
18 Phillips case. Do you have the cite again for me?

19 THE COURT: Yeah. It is 892 F.3d 1203. You
20 Shepardize Alleyne to get that case. Phillips is 349 F.3d 138.
21 That remains good law in the Third Circuit, and the DC circuit
22 had extensive discussion of other Courts' opinions.

23 MR. WITHERELL: I would just ask Your Honor give us
24 until Monday.

25 MR. GOLDMAN: One other item, Your Honor. The

1 defense believes that there has to be a unanimous finding as to
2 specific drugs in Count 1 because you could have a case, for
3 example --

4 THE COURT: My proposal has that. My interrogatories
5 under Count 1 states that you have to be unanimous as to the
6 quantity as to the defendant they have found is a
7 co-conspirator. It's in there if you read it.

8 MR. GOLDMAN: I did read it, Your Honor.

9 THE COURT: Well, it's in there. The only thing I'm
10 not doing is breaking down the quantity by individual defendant
11 who has been found guilty of conspiracy. If they're not guilty
12 of conspiracy, it's irrelevant.

13 MR. GOLDMAN: All I ask -- I'll refocus. I didn't
14 catch what you're saying that you put in that, but if you give
15 us an opportunity to spend five minutes to at least put on the
16 record our position --

17 THE COURT: Why don't we start again Monday at 8:45
18 so we can put this on the record. But as the authorities that
19 I have researched so far, I'm stuck with my conclusion as being
20 the right one.

21 And I want to add to that, that I think, once having
22 charged on conspiracy under the Third Circuit model charge, to
23 then ask each juror to find specific quantities for a specific
24 defendant would be totally confusing. And that was why I
25 started out with my own verdict form because, with all due

1 respect to the Government, theirs was, like, 37 pages, their
2 verdict form, and it was so confusing. I said there's got to
3 be a better way of doing this. That's where we are.

4 Have a nice weekend. I'm going to be out of town
5 tomorrow. Any emergencies, call my chambers, and they'll try
6 and get in touch with me. Thank you.

7 (Proceedings adjourned at 3:46 p.m.)

8

9 CERTIFICATE

10

11 I certify that the foregoing is a correct transcript from the
12 record of proceedings in the above-entitled matter.

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16 Shannan Gagliardi, RDR, CRR

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MR. GOLDMAN: [43] 7/20 8/3 11/24 60/15 60/17 111/18 113/11 114/9 116/21 117/16 117/25 118/7 118/10 126/2 126/6 127/25 128/9 128/15 128/18 128/20 128/22 128/25 129/8 129/18 131/7 132/1 134/18 134/20 134/22 134/24 136/11 138/11 140/8 140/10 160/3 161/3 198/24 200/12 200/21 204/18 228/25 229/8 229/13	148/24 149/2 149/9 149/11 149/22 150/16 150/18 151/1 151/13 151/15 151/21 151/23 152/5 152/7 153/14 154/1 154/15 155/2 155/6 156/15 156/24 158/11 158/20 159/1 159/4 159/7 159/10 159/21 159/24 160/2 160/5 160/9 160/16 160/24 161/5 161/10 161/17 174/14 175/8 175/22 176/8 179/9 180/24 181/17 182/6 182/8 183/10 183/12 183/14 189/9 189/23 190/2 192/6 192/10 192/16 193/3 194/1 195/21 196/8 196/11 197/12 197/19 200/11 200/23 201/16 202/4 202/7 202/9 202/11 202/13 202/15 203/5 203/9 203/12 203/17 203/21 204/13 204/20 204/25 205/4 205/11 205/17 205/24 207/3 207/7 207/9 224/1 225/11 226/1 228/14 228/19 229/4 229/9 229/17	10 kilos [1] 217/9 10,000 [3] 28/23 163/16 167/1 10-dollar [1] 188/22 10.5 grams [1] 67/17 10/13 [1] 89/17 10/13/2017 text [1] 140/14 100 [2] 3/6 33/3 1000 [4] 28/7 28/15 30/3 30/7 10:37 [1] 72/21 10:40 [1] 74/23 10:55 [1] 74/23 10:56 [1] 75/1 11 [8] 3/4 34/12 35/6 36/3 195/15 210/21 210/25 218/3 11,766 grams [1] 71/18 11/21 [2] 75/20 76/15 11/27 [4] 61/23 78/16 130/8 135/13 11/27 text [2] 133/18 147/23 11/27/2017 [2] 51/17 76/16 11/28 [1] 80/11 11/30 [1] 147/9 111 [1] 3/6 112 grams [1] 72/9 12 [7] 39/20 39/21 86/9 86/16 162/18 192/20 227/11 12/25 [1] 140/2 12/25/2017 [2] 55/9 139/5 12/26/2017 [1] 57/1 12/27/17 [1] 138/25 12/27/2017 [1] 54/16 12/28/2017 [3] 57/11 57/25 126/18 12/7 [1] 53/20 1203 [2] 226/23 228/19 120K [1] 222/6 121 [1] 2/8 1212 [1] 180/2 125 [4] 53/19 70/11 81/17 104/2 125 grams [14] 30/8 42/2 42/3 53/18 55/19 66/16 70/12 77/16 77/19 81/15 81/18 130/12 183/7 183/9 125-gram [3] 30/10 30/11 77/3 1250 [2] 1/14 78/19 12:30 [1] 159/16 12:59 [1] 159/18 13 [5] 43/10 64/16 89/7 89/17 224/4 13,000 [1] 219/4 130 [1] 87/4 133 [3] 6/23 6/25 226/5 138 [2] 3/7 228/20 13th [4] 1/19 42/17 90/10 177/13 14 [10] 1/7 30/22 42/18 42/24 43/10 53/5 64/15 65/20 67/7 224/4 14 grams [14] 30/20 31/4 42/19 42/20 52/24 53/6 61/13 62/23 63/17 63/21 65/24 67/23 81/2 82/16 14,000 [1] 98/18 149 [1] 3/7 14th [3] 61/12 209/8 222/18 15 [4] 19/18 24/5 86/12 166/12 15,000 [1] 22/19 15,600 [3] 54/25 55/3 55/7 150 [2] 105/11 105/12 152 [1] 3/9 156 [1] 3/9 15th [1] 42/17 16 [3] 73/1 73/16 221/3 160 grams [1] 36/5 161 [1] 3/12
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